

ALAMOS GOLD INC.
LYNN LAKE

Lynn Lake Gold Project

Federal Decision Statement: Annual Compliance Report

Year 2024

March 24, 2025

Executive Summary

Alamos Gold Inc. (“Alamos”) is mandated to submit an annual report detailing its compliance with conditions outlined in the federal Decision Statement for the Lynn Lake Gold Project (the “Project”). Despite no construction decision made in 2024, Alamos remains committed to meeting regulatory requirements.

Although no project activities occurred, several pre-construction requirements were completed and plan development continued including related consultation (engagement) with Indigenous Nations. Opportunities were provided for plant harvesting, transplanting, and cultural ceremonies (Condition 5.2.2), and pre-construction surveys were conducted to identify boreal woodland caribou (*Rangifer tarandus caribou*) calving and calf-rearing habitats (Condition 10.1). Ongoing quarterly Environmental Advisory Committee meetings (Condition 8.1), initiated in October 2023, were held, alongside other Indigenous Nation specific engagement activities, demonstrating Alamos’ commitment to meaningful engagement.

Annual updates to required plans and modifications to mitigation measures were not applicable in 2024 due to the absence of submitted plans and Project activities.

In summary, this 2024 Annual Compliance Report highlights Alamos' commitment to environmental stewardship and Indigenous engagement, despite the absence of construction activities during the reporting period.

Résumé

Alamos Gold Inc. (« Alamos ») est tenue de présenter un rapport annuel qui explique la façon dont la société satisfait aux conditions énoncées dans la déclaration de décision fédérale pour le projet aurifère de Lynn Lake (le « projet »). Bien qu’il n’y ait pas eu de décision de construction en 2024, Alamos tient résolument à respecter les exigences réglementaires.

Bien qu’aucune activité liée au projet n’ait été réalisée, plusieurs exigences préalables à la construction ont été remplies et l’élaboration du plan s’est poursuivie, notamment la consultation (mobilisation) des Nations autochtones. Des possibilités de récolte, de transplantation et de cérémonies culturelles (condition 5.2.2) ont été offertes, et des études préalables à la construction ont été menées pour délimiter les habitats de mise bas et d’élevage du caribou des bois (*Rangifer tarandus caribou*) (condition 10.1). Des réunions trimestrielles régulières du Comité consultatif de l’environnement (condition 8.1), mis sur pied en octobre 2023, ont été organisées, ainsi que d’autres activités de mobilisation propres aux Nations autochtones, montrant l’engagement d’Alamos à l’égard d’une consultation concrète.

La mise à jour annuelle des plans requis et la modification des mesures d’atténuation ne s’appliquaient pas en 2024 en raison de l’absence de plans soumis et d’activités de projet.

En résumé, le rapport annuel de conformité de 2024 souligne l’engagement d’Alamos en matière de gestion de l’environnement et de consultation des Autochtones, malgré l’absence d’activités pendant la période visée par le rapport.

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1. Concordance Table

This concordance table summarizes the compliance status and actions taken or not taken with respect to each condition outlined in the decision statement to be reported on for the Lynn Lake Gold Project by Alamos.

Condition	Condition *(Extract from the Decision Statement)*	Alamos' Action Description
Condition 2.1	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including policies, guidelines and directives and community and Indigenous knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.	No construction decision made in 2024, thus no actions to report. Alamos commits to fulfilling this condition once the Project progresses with all project planning focused in this regard.
Condition 2.5	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with Indigenous groups and any other parties being consulted during the development, the following information, unless otherwise specified in the condition: • 2.5.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program; • 2.5.2 the scope, content and frequency of reporting of the results of the follow-up program to the parties consulted for the development of the follow-up program; • 2.5.3 the minimum frequency at which the follow-up program must be reviewed and, if necessary, updated; • 2.5.4 the levels of environmental change relative to baseline that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities causing the environmental change to be stopped; • 2.5.5 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.5.4 have been reached or exceeded; and	No follow-up programs initiated due to absence of Project activities. Follow-up programs encompass various environmental and socio-economic aspects, which will be reported comprehensively in future.

Condition	Condition *(Extract from the Decision Statement)*	Alamos' Action Description
	• 2.5.6 the specific and measurable end points that must be achieved before the follow-up program can end. Those end points should indicate that the accuracy of the environmental assessment has been verified and/or that the mitigation measures are effective.	
Condition 2.8	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement: • 2.8.1 implement the follow-up program according to the information determined pursuant to condition 2.5; • 2.8.2 conduct monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure; • 2.8.3 determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to condition 2.8.2; • 2.8.4 if modified or additional mitigation measure(s) are required pursuant to condition 2.8.3, develop and implement these mitigation measure(s) as soon as feasible and monitor them pursuant to condition 2.8.2. The Proponent shall notify the Agency in writing within 48 hours of any modified or additional mitigation measure being implemented. If the Proponent implements any additional or modified mitigation measure not previously submitted to the Agency pursuant to condition 2.5, the Proponent shall submit a detailed description of the measure(s) to the Agency within 7 days of their implementation; and • 2.8.5 report all results of the follow-up program to the Agency no later than March 31 following each reporting year during which the follow-up program is implemented and, subject to information determined pursuant to 2.5.2, to the parties being consulted during the development of the follow-up program.	No follow-up programs or plans submitted in 2024; thus, no modifications or additional mitigation measures proposed or implemented. Follow-up programs will be implemented as required once Project activities commence.
Condition 2.10 and Condition 2.10.1	The Proponent shall prepare an annual report for each reporting year that sets out: • 2.10.1 the activities undertaken by the Proponent to comply with each of the conditions set out in this Decision Statement;	This Annual Compliance Report structure follows reporting requirements outlined in this condition.

Condition	Condition *(Extract from the Decision Statement)*	Alamos' Action Description
Condition 2.10.2	The Proponent shall prepare an annual report for each reporting year that sets out: • how the Proponent complied with condition 2.1;	No construction decision made in 2024; no specific actions to report regarding compliance with Condition 2.1. Alamos commits to comprehensive documentation of adherence to Condition 2.1 once activities commence.
Condition 2.10.3	The Proponent shall prepare an annual report for each reporting year that sets out: • for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation, and the resources provided to support their participation in consultation activities;	Summary of consultation (engagement) activities conducted during the development of plans and related to pre-construction conditions included in Section 3.3. The ongoing quarterly meetings of an Environmental Advisory Committee (established in October 2023 prior to a construction start) throughout 2024 demonstrates commitment to meaningful engagement with the Indigenous Nations engaged on the Project, in alignment with Condition 8.1.
Condition 2.10.4	The Proponent shall prepare an annual report for each reporting year that sets out: • the information referred to in conditions 2.5 and 2.8 for each follow-up program;	No results to report due to absence of Project activities. Follow-up programs mandated under various conditions will be comprehensively reported in future.
Condition 2.10.5	The Proponent shall prepare an annual report for each reporting year that sets out: • a summary of the available results of the follow-up program requirements identified in conditions 3.12, 3.13, 3.14, 3.15, 4.5, 4.6, 6.3, 6.4, 6.5, 9.3, 10.5 and 12.2;	Only results for pre-construction surveys (Condition 10.1) reported due to absence of Project activities and non-submission of any plans.
Condition 2.10.6	The Proponent shall prepare an annual report for each reporting year that sets out: • for any plan that is a requirement of a condition set out in this Decision Statement, any update(s) to the plan that have been made during the reporting year; and	No updates to required plans due to absence of Project activities and non-submission of any plans.
Condition 2.10.7	The Proponent shall prepare an annual report for each reporting year that sets out:	No modified or additional mitigation measures proposed or implemented due to absence of Project activities and non-

Condition	Condition *(Extract from the Decision Statement)*	Alamos' Action Description
	• any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent, as determined pursuant to condition 2.8.	submission of follow-up programs and plans.

Condition 8.1	The Proponent shall establish, prior to construction and in consultation with Indigenous groups, and maintain, during all phases of the Designated Project, an Indigenous Environmental Advisory Committee (IEAC) related to ongoing Designated Project activities, including land use planning, and the development and implementation of follow-up programs, and mitigation measures. The Proponent shall invite Indigenous groups to engage in all IEAC activities, and shall consult participating Indigenous groups on the development of Terms of Reference for the IEAC. The Proponent shall strive to reach consensus on the Terms of Reference with participating Indigenous groups. The Proponent shall submit the final Terms of Reference to the Agency. As part of the Terms of Reference, the Proponent shall include:
	• 8.1.1 the means by which the Proponent and Indigenous groups shall jointly identify topics to be discussed by the IEAC and the means by which the Proponent shall document these topics and discussions;
	• 8.1.2 the frequency, timing and location of IEAC meetings during each phase of the Designated Project and the means by which the Proponent shall document meeting minutes and shall seek approval of the meeting minutes by Indigenous groups;
	• 8.1.3 the means by which the Proponent shall share with the IEAC the following information, including when and how this information will be shared:
	  ○ 8.1.3.1 opportunities for participating in ongoing Designated Project activities, including land use planning, and the development and implementation of follow-up programs and mitigation measures;
	  ○ 8.1.3.2 opportunities for providing feedback on effects to cultural heritage, in accordance with condition 7.2, and how feedback will be addressed;
	  ○ 8.1.3.3 the results of the follow-up programs, including any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent as a result of each follow-up requirement; and
		Although no construction decision was made in 2024, proactive steps such as the continued quarterly meetings of the Environmental Advisory Committee and ongoing engagement with the Indigenous Nations engaged on the Project through the entirety of 2024 reflect commitment to meaningful consultation, in accordance with this condition.

Condition	Condition *(Extract from the Decision Statement)*	Alamos' Action Description
	○ 8.1.3.4 other information as determined by the IEAC; and • 8.1.4 the means by which the Proponent shall evaluate, in consultation with Indigenous groups, the Terms of Reference to determine whether administrative or management improvements are required to increase the efficiency and effectiveness of the IEAC.	

2. Introduction

Alamos is required to submit an annual report for each reporting year (i.e., January 1-December 31 of the same calendar year). The first reporting year starts on the day the Minister of Environment issues the Decision Statement. Alamos has received the necessary provincial (March 6, 2023; Environment Act Licences No. 3391 [MacLellan site] and No. 3390 [Gordon site]) and federal (Impact Assessment Agency of Canada [IAAC], Decision Statement, March 5, 2023) environmental approvals for the Project.

This Annual Compliance Report includes details for the year 2024 relating to Alamos' compliance with the conditions outlined in the Decision Statement, including activities undertaken, compliance with specific conditions, consultation (engagement) efforts, follow-up program information, results summary, updates to required plans, and any modified or additional mitigation measures proposed or implemented.

Alamos did not make an internal construction decision in 2024 and there was no construction activity as described in the Project Description (PD) and the Environmental Impact Statement (EIS) for the Project in 2024.

Project design and planning work was ongoing in 2024, including the development of management and monitoring plans. Considering the absence of a construction decision or any construction activity in 2024, the only compliance activities undertaken by Alamos to comply with the conditions set out in this Decision Statement are related to pre-construction requirements and plan development.

Note, a construction decision for the Project was announced by Alamos on January 13, 2025, which will mark the onset of construction at the MacLellan site in February 2025.

3. Annual Reporting

This Annual Compliance Report is structured following the reporting requirements as outlined in Condition 2.10 of the Decision Statement.

3.1. Activities undertaken by the Proponent to comply with the Decision Statement as per Condition 2.10.1

Given the absence of a Project construction decision or construction activity through 2024, activities undertaken by Alamos in 2024 to comply with the conditions set out in the Decision Statement are related to pre-construction requirements. As such, the only compliance activities to report for 2024 pertain to the continuous development of plans and Condition 5.2.2 and Condition 10.1 of the Decision Statement. Although no plans were submitted in 2024, several plans were finalized (Version 0) following engagement with Indigenous Nations as summarized in Section 3.3 below. Per Condition 5.2.2, opportunities were provided to Indigenous Nations in 2024 to harvest and transplant plant species used for traditional purposes and conduct ceremonies for any sites of traditional or cultural importance that will be disturbed by any Project activities. Per Condition 10.1, pre-construction surveys within the PDA to identify boreal woodland caribou calving (*Rangifer tarandus caribou*) and calf-rearing habitat were completed in 2024.

Continued engagement activities with Indigenous Nations were undertaken including the proactive ongoing meetings of the Environmental Advisory Committee as outlined in Section 3.3 below.

3.2. Compliance with Condition 2.1 as per Condition 2.10.2

As of December 31, 2024, no construction decision for the Project had been made, and consequently, no work was initiated in 2024. Therefore, there are no specific actions to report in relation to Condition 2.1 of the Decision Statement. However, Alamos remains committed to fulfilling this and other conditions diligently once the Project progresses to the appropriate phase. Alamos will ensure that actions taken during all phases of the Designated Project are conducted in accordance with the principles outlined in Condition 2.1. This includes careful and precautionary consideration of all phases, promotion of sustainable development, utilization of the best available information and knowledge, adherence to recognized methods and models, engagement of qualified individuals, and implementation of economically and technically feasible technologies. Upon commencement of activities, Alamos will provide comprehensive documentation detailing adherence to Condition 2.1 throughout the Project lifecycle.

3.3. Consultation (Engagement) Compliance as per Condition 2.10.3

Although no plans were submitted in 2024, several plans were finalized (Version 0) following consultation (engagement) with Indigenous Nations. Final drafts of all plans were provided to the EAC and Indigenous Nations not participating in the EAC. All feedback received from the Indigenous Nations was considered and incorporated in the finalization (Version 0) of the plans. Where feedback was not integrated, a written rationale was provided. Responses including requested information and descriptions of feedback integration into the plans were sent to each corresponding Indigenous Nation who provided feedback.

As part of this process, Marcel Colomb First Nation requested enhanced training, additional reporting, more protections incorporated into the management and monitoring plans for fur-bearers, additional sampling of stocked fish including fish tissue analysis, and a waste disposal agreement with the Town of Lynn Lake. Alamos invited Marcel Colomb First Nation's input on heritage resources, updated plans for fur-bearers and

stocked fish, maintained fish tissue analysis as outlined in the Aquatic Effects Monitoring Plan (AEMP), and continues to explore waste disposal options with the Town of Lynn Lake.

The Manitoba Métis Federation provided feedback seeking their participation in monitoring programs, capacity funding, and Métis-focused studies. Alamos provided responses outlining that a Community Relations Manager is being hired by Alamos and encouraged applications for this and other environmental monitor roles. Indigenous Knowledge will inform monitoring and reclamation, with data shared via the EAC. Alamos advised that heritage protocols follow regulations, but Manitoba Métis Federation input is welcomed.

Additional feedback was not received specifically for the plans in 2024. However, Alamos heard feedback from Indigenous Nations on capacity and timeline constraints related to the plan reviews and advised back that it could accommodate reasonable extensions within permitting limits, incorporating late feedback into future updates as confirming that all plans are living documents throughout the life of mine. Alamos emphasized that its environmental monitoring plans follow relevant environmental regulations, and also include Indigenous Nations input, verification of assumptions made in the EIS, incorporates the concept of ongoing adaptive mitigation, and ensures accountability through independent oversight. Views or information received from Indigenous Nations regarding the plans after their finalization will be considered and incorporated into subsequent plan updates and included in the annual reporting process as per Condition 2.10.6 of the Decision Statement.

In June 2024 and throughout meetings of the EAC, Indigenous Nations were engaged to determine times for plant harvest and transplant, and ceremony opportunities as per Condition 5.2.2. No Indigenous Nation expressed interest in conducting plant harvest and transplant activities during the three opportunities within the Project Development Area (PDA) throughout spring, summer and fall of 2024. Similarly, Alamos did not receive recommendations or requests for ceremony opportunities.

Indigenous Nations were also engaged in May 2024, prior to the pre-construction surveys that were completed within the PDA to identify boreal woodland caribou calving and calf-rearing habitat as per Condition 10.1. The Manitoba Métis Federation raised questions about Alamos' caribou surveying processes as defined in Condition 10.1, to which Alamos noted that its surveys at minimum meet the federal requirements. Alamos has a robust Wildlife Management and Monitoring Plan (WMMP) in place that includes the use of remote cameras and radio-collaring. This feedback is further documented in Appendix A. Alamos has also finalized an agreement with the Province of Manitoba to take part in the provincial collaring program for woodland caribou, which will provide better information on movement, especially during the calf-rearing time window. Alamos understands the importance of capturing a fulsome understanding of caribou land use throughout all seasons and as such, has been monitoring caribou and other wildlife since 2015. Alamos' WMMP incorporates caribou mitigations and adaptive procedures. No other feedback was received from other Indigenous Nations.

Alamos remained committed in 2024 to fulfilling its obligations as outlined in Condition 8.1, despite not yet reaching a construction decision in 2024. The ongoing quarterly meetings of the EAC were undertaken proactively, reflecting our dedication to meaningful engagement with the Indigenous Nations engaged on the Project. The Terms of Reference for the EAC were finalized, with input from participating Indigenous

Nations, in alignment with Condition 8.1's requirement for consultation (engagement) and have been shared with IAAC prior to commencing Project construction.

The EAC meetings in 2024 saw active participation from various Indigenous Nations, including the Marcel Colomb First Nation, Mathias Colomb Cree Nation, Manitoba Métis Federation, Métis Nation – Saskatchewan, Nisichawayasihk Cree Nation, O-Pipon-Na-Piwin Cree Nation, and Peter Ballantyne Cree Nation. Despite not all Nations attending, the minutes of the EAC gatherings are shared with all 13 Nations involved in the Project, ensuring transparency and providing the opportunity for involvement in the decision-making process.

Moreover, Alamos maintains ongoing engagement with the Marcel Colomb First Nation, exemplified by the continued meetings of additional subcommittees enacted through the Benefit Agreement signed in 2023. These quarterly meetings are aimed at integrating Indigenous Knowledge across all aspects of Alamos' operations. Marcel Colomb First Nation had the opportunity to review the draft of this Annual Compliance Report. No comments were received from the Nation.

By establishing and actively involving Indigenous Nations in the EAC, Alamos is demonstrating its commitment to collaborative decision-making, cultural preservation, and environmental stewardship, in accordance with Condition 8.1 and beyond.

3.4. Summary of Follow-up Program Information and Results as per Condition 2.10.4 and 2.10.5

Due to the absence of any Project construction activity and non-submission of plans in 2024, there is no information to report in accordance with Condition 2.10.4 and there are only the results of the pre-construction surveys required under Condition 10.1 (follow-up program requirement in Condition 10.5) to report in accordance with Condition 2.10.5 of the Decision Statement. Condition 2.10.4 specifies the information required from follow-up programs under Conditions 2.5 and 2.8, while Condition 2.10.5 outlines the summary of available results for follow-up program requirements specified in Conditions 3.12, 3.13, 3.14, 3.15, 4.5, 4.6, 6.3, 6.4, 6.5, 9.3, 10.5, and 12.2. As per Condition 2.5 and 2.8, where follow-up programs are mandated, the Proponent is tasked with determining and implementing necessary measures. Given the absence of a Project construction decision or any related activity in 2024, the only pre-construction measure completed was the pre-construction surveys within the PDA to identify boreal woodland caribou calving and calf-rearing habitat as per Condition 10.1, specified as a follow-up program requirement under Condition 10.5 of the Decision Statement. The pre-construction surveys were completed in Spring 2024 and the results are included in Appendix A below.

Follow-up programs mandated encompass a range of environmental and socio-economic aspects. These include monitoring and addressing adverse effects on water quality, water quantity, fish habitat, and migratory birds, as well as mitigating acid rock drainage and metal leaching. Furthermore, they entail assessing impacts on air quality, country foods, socio-economic conditions, and health due to noise and vibration. Greenhouse gas emissions, effects on boreal woodland caribou habitat, and changes in permafrost are also integral components. All findings and actions taken within these follow-up programs will be comprehensively reported as part of the annual reporting process.

The follow-up plans entail several central components. Under Condition 2.5, the requirements include specifying the methodology, location, frequency, timing, and duration of monitoring associated with the follow-up program. It also entails defining the scope, content, and frequency of reporting the program results to relevant parties. Additionally, it mandates setting minimum review frequencies and identifying thresholds triggering modified or additional mitigation measures. Furthermore, it necessitates outlining feasible mitigation measures and establishing specific measurable endpoints for program termination. Under Condition 2.8, adherence to the determined information from Condition 2.5 is required, along with conducting monitoring and analysis to verify environmental assessment accuracy and mitigation measure effectiveness. If necessary, modified or additional mitigation measures must be promptly implemented and monitored, with detailed reporting to the Agency and relevant parties by March 31 of the following yeyar for each reporting year.

3.5. Annual Updates to Required Plans as per Condition 2.10.6

Given the absence of Project activities and the non-submission of any plans in 2024, there are no relevant updates to report for the following plans mandated by the Decision Statement: an offsetting plan for mitigating residual effects on fish and fish habitat, a protocol for inspecting and cleaning vehicles to limit the spread of weed species, a protocol for addressing noise and vibration feedback, an archaeological and heritage resource management plan, a greenhouse gas management plan, an accidents and malfunctions response plan, and a communication plan for accidents and malfunctions. Therefore, there are no updates to any of these plans for this reporting year as required by Condition 2.10.6.

3.6. Modified Mitigation Measures as per Condition 2.10.7 and in compliance with Condition 2.8

Considering the absence of Project activities and the non-submission of any follow-up programs and plans in 2024, there have been no modified or additional mitigation measures implemented or proposed by Alamos as determined pursuant to Condition 2.8 of the Decision Statement. Condition 2.8 mandates the implementation of follow-up programs where required, as specified in the earlier provided list of plans. As there have been no activities or submitted plans, there are no such modifications or additions to report during the reporting year, in accordance with Condition 2.10.7.

4. Conclusion

The 2024 annual report reaffirms Alamos' strong commitment to environmental stewardship, Indigenous partnership, and regulatory adherence. Despite the absence of construction activities during this period, our completion of pre-construction requirements and ongoing consultation (engagement) activities, including the proactive meetings of the Environmental Advisory Committee, demonstrate our dedication to sustainable practices and inclusive decision-making processes. As we continue toward Project implementation, we remain determined in our commitment to meeting regulatory standards and fostering positive relationships with all stakeholders involved in the LLGP.

APPENDIX A

Results of Lynn Lake Gold Project Pre-Construction Monitoring: Caribou Calving and Calf-Rearing Habitat Surveys 2024

Stantec

Memo

To:	Alamos Gold Inc.	From:	Stantec Consulting Ltd.
Project/File:	111473076	Date:	August 16, 2024

Reference: Lynn Lake Gold Project Pre-Construction Monitoring: Caribou Calving and Calf-Rearing Habitat 2024

Introduction

As per condition 10.1 of the Decision Statement Issued under Section 54 of the *Canadian Environmental Assessment Act, 2012*, for the Lynn Lake Gold Project (the Project), Alamos Gold Inc. (Alamos) is required to complete pre-construction surveys to identify boreal woodland caribou (*Rangifer tarandus caribou*; hereafter woodland caribou) calving and calf-rearing habitat in Project Development Area (the PDA; Map 1) "*in consultation with Indigenous groups and relevant authorities*". This memo provides the results of the spring 2024 woodland caribou field survey for the purpose of satisfying this licence condition.

Background

Woodland caribou are listed as Threatened under the federal *Species at Risk Act* and *The Endangered Species and Ecosystems Act of Manitoba*. During the calving period, pregnant females select isolated peatlands, islands in lakes, lakeshores, and forests, where predators are relatively sparse and nutritious forage is available (Environment and Climate Change Canada [ECCC] 2020[1]). In winter, terrestrial and arboreal lichens are an important food source (Environment Canada 2011[2]). From spring to fall, herbaceous plants, grasses, and sedges are typically consumed in addition to lichens (Environment Canada 2011).

ECCC (2020) describes the following biophysical attributes for woodland caribou critical calving habitat in the Boreal Shield West ecoregion, where the Project is located:

- "*Peat lands, stands dominated by black spruce, mature forest stands and treed muskeg all used for calving*
- *Caribou will use islands, small lakes, lakeshores during calving*"

ECCC (2020) describes the following biophysical attributes for woodland caribou calf-rearing habitat in the Boreal Shield West ecoregion:

- "*Wooded lakeshores, islands, sparsely treed rock, upland conifer-spruce and treed muskeg are used in summer*
- *Sites with a high abundance of arboreal lichen are important for foraging in some areas*

[1] Environment and Climate Change Canada. 2020. "Amended recovery strategy for the woodland caribou (*Rangifer tarandus caribou*), Boreal population, in Canada." *Species at Risk Act* Recovery Strategy Series. Environment Canada, Ottawa, ON. 143 pp.

[2] Environment Canada. 2011. "Scientific assessment to inform the identification of critical habitat for woodland caribou (*Rangifer tarandus caribo*u), Boreal population, in Canada: 2011 update." Environment Canada, Ottawa, ON. 102 pp.

- *Dense conifer and mixed forest are also used*"

The Manitoba North boreal caribou range (ECCC 2020) and Kamuchawie Caribou Management Unit (Manitoba Boreal Woodland Caribou Management Committee 2015[3]), delineated by the federal and provincial governments, respectively, overlap the Regional Assessment Area (RAA). No woodland caribou range has been delineated in the Kamuchawie Caribou Management Unit and there is no population estimate (Manitoba Boreal Woodland Caribou Management Committee 2015). Provincial biologists and local resource users were contacted during baseline wildlife studies and indicated that woodland caribou are unlikely to be found in the RAA except accidentally (Stantec 2017[4]). However, recent results from Alamos' camera monitoring studies show woodland caribou presence along the southwestern and western edges of the RAA (Stantec 2020[5]; Stantec 2024 unpublished data; Map 2).

Aerial surveys and collaring studies have recently been undertaken by Manitoba Economic Development, Investment, Trade and Natural Resources to understand local woodland caribou populations in the Kamuchawie Caribou Management Unit. Alamos is working to collaborate with the province on a five-year collaring program for year-round monitoring of woodland caribou in the Kamuchawie Caribou Management Unit and continues to monitor for caribou using remote cameras positioned in the western portion of the RAA, where caribou presence was previously detected, as well as in the Local Assessment Area (LAA) and the Gordon and MacLellan site PDAs. Although caribou have been detected in the western portion of the RAA (provincial survey 2023 unpublished data; Stantec 2024 unpublished data), there is no evidence to suggest that caribou are occupying the PDA (Map 2). Approximately 96% of the PDA (1,128.60 hectares [ha] of 1172.04 ha) consists of directly or indirectly disturbed habitat that is likely unsuitable for caribou (Environment Canada 2011), which was supported by provincial and ECCC biologists and communicated as part of the conditional monitoring program review and feedback process.

Objectives

The objectives of the caribou calving and calf-rearing habitat surveys were to:

- Identify and map potential woodland caribou calving and calf-rearing habitat within the PDA.
- Identify signs of caribou activity, if any, in the potential calving and calf-rearing habitat areas identified in the PDA.

Study Design and Methods

Desktop Review

Potential woodland caribou calving and calf-rearing habitat in the PDA was identified with existing land use/land cover geographic information system (GIS) mapping, using the criteria set out by ECCC (2020) and described above. Although woodland caribou are known to avoid disturbance by up to 500 metres (m) or more, a disturbance buffer was not applied, and all adjacent lands meeting the criteria for calving or calf-rearing habitat were considered in the survey design. Of the 287.82 ha in the Gordon site PDA, 96.27 ha

[3] Manitoba Boreal Woodland Caribou Management Committee. 2015. "Conserving a boreal icon, Manitoba's boreal woodland caribou recovery strategy." Manitoba Conservation and Water Stewardship, Winnipeg, MB. 30 pp.
[4] Stantec 2017. "Lynn Lake Gold Project (LLGP): Mammal Baseline Technical Data Report 2015-2017 Terrestrial Environment Baseline Program." Prepared for Alamos Gold Inc. by Stantec Consulting Ltd. 37 pp.
[5] Stantec 2020. "Lynn Lake Gold Project (LLGP): Mammal Baseline Technical Data Validation Report." Prepared for Alamos Gold Inc. by Stantec Consulting Ltd. 10 pp.

has potential to support caribou calving and calf-rearing (Table 1). Of the 884.22 ha in the MacLellan site PDA, 766.32 ha has the potential to support caribou calving and calf-rearing.

Table 1 Land Cover within the Project Development Area

Type	Baseline Land Cover	Potential Suitability	Area Gordon (ha)	Area MacLellan (ha)
Wetland	Bog shrubby	Suitable	12.46	37.85
	Bog treed	Suitable	8.40	175.69
	Swamp shrubby	Less suitable	2.26	8.82
	Swamp treed	Less suitable	2.36	61.26
Upland	Conifer dense	Suitable	20.62	222.03
	Conifer open	Suitable	21.68	162.84
	Conifer sparse	Suitable	28.49	97.83
Total			**96.27**	**766.32**

Fecal Pellet and Track Survey

To examine whether potential calving and calf-rearing habitat in the PDA is occupied by caribou, two biologists systematically searched the Gordon and MacLellan sites for signs of caribou activity (fecal pellets and tracks) from May 31 to June 2, 2024. Starting from an access feature (road, trail, or clearing), transects were established through the habitat patches (Map 3, Map 4). All caribou pellets encountered along a transect within a belt approximately 1 m to either side were to be recorded as “new” or “old.” New pellets, deposited during the most recent winter or spring, are typically shiny and may be greenish inside. Old pellets may be cracked, weathered, mouldy, or deteriorated. A Global Positioning System (GPS) waypoint was to be marked at each pellet group encountered. Signs of predator (e.g., black bear [*Ursus americanus*] and gray wolf [*Canis lupus*]) and alternative prey (moose [*Alces americanus*]) activity were also recorded and georeferenced. Survey locations were accessed by road or by helicopter.

Survey Plan Engagement

In following the requirement of condition 10.1 to have the survey plan reviewed by Nations and applicable regulators, Alamos notified provincial and ECCC biologists and the Environmental Advisory Committee members of the study design and methods for the proposed fecal pellet and track survey and their feedback was solicited. The Manitoba Métis Federation (MMF) and ECCC provided questions, concerns, and recommendations that were addressed with formal responses (**Attachment A**).

The methods for the survey were developed based on, and as dictated by, condition 10.1 of the Decision Statement Issued under Section 54 of the *Canadian Environmental Assessment Act, 2012*. The MMF and other engaged Nations were directly involved in the development of the methods through their feedback, which Alamos considered and integrated as appropriate to meet the Decision Statement condition. As such, the MMF’s recommended modification of the proposed assessment was not warranted; Alamos thanked the MMF and appreciated the feedback.

Results and Discussion

Transects in the Gordon site PDA totalled 3,560 m in length for a survey area of 7,120 square metres (m²). Transects in the MacLellan site PDA totalled 12,660 m in length for a survey area of 25,320 m². No sign of caribou was observed in the PDA during the fecal pellet and track survey. Signs of moose (Photo 1, Photo 2) and black bear (Photo 3) were observed both in the Gordon site and MacLellan site PDA (Table 2; Map 5, Map 6). Canada lynx (*Lynx canadensis*) scat (Photo 4) was found in the Gordon site PDA and a gray wolf track (Photo 5) was encountered in the MacLellan site PDA. An active gray wolf den was incidentally observed approximately 1 km south of the MacLellan site PDA (Photo 6).

Table 2 Large Mammal Signs Observed within the Project Development Area

Species	Number Gordon	Number MacLellan
Black bear	3	3
Canada lynx	1	0
Gray wolf	0	1
Moose	6	4
Unknown carnivore	0	1
Woodland caribou	0	0

Reference: **Lynn Lake Gold Project Pre-Construction Monitoring: Caribou Calving and Calf-Rearing Habitat 2024**

Photo 1 Moose Scat Observed in the Gordon Site PDA, May 31, 2024



Photo 2 Moose Track Observed in the MacLellan Site PDA, June 1, 2024



Reference: **Lynn Lake Gold Project Pre-Construction Monitoring: Caribou Calving and Calf-Rearing Habitat 2024**

Photo 3 Black Bear Scat Observed in the Gordon Site PDA, May 31, 2024



Photo 4 Canada Lynx Scat Observed in the Gordon Site PDA, May 31, 2024

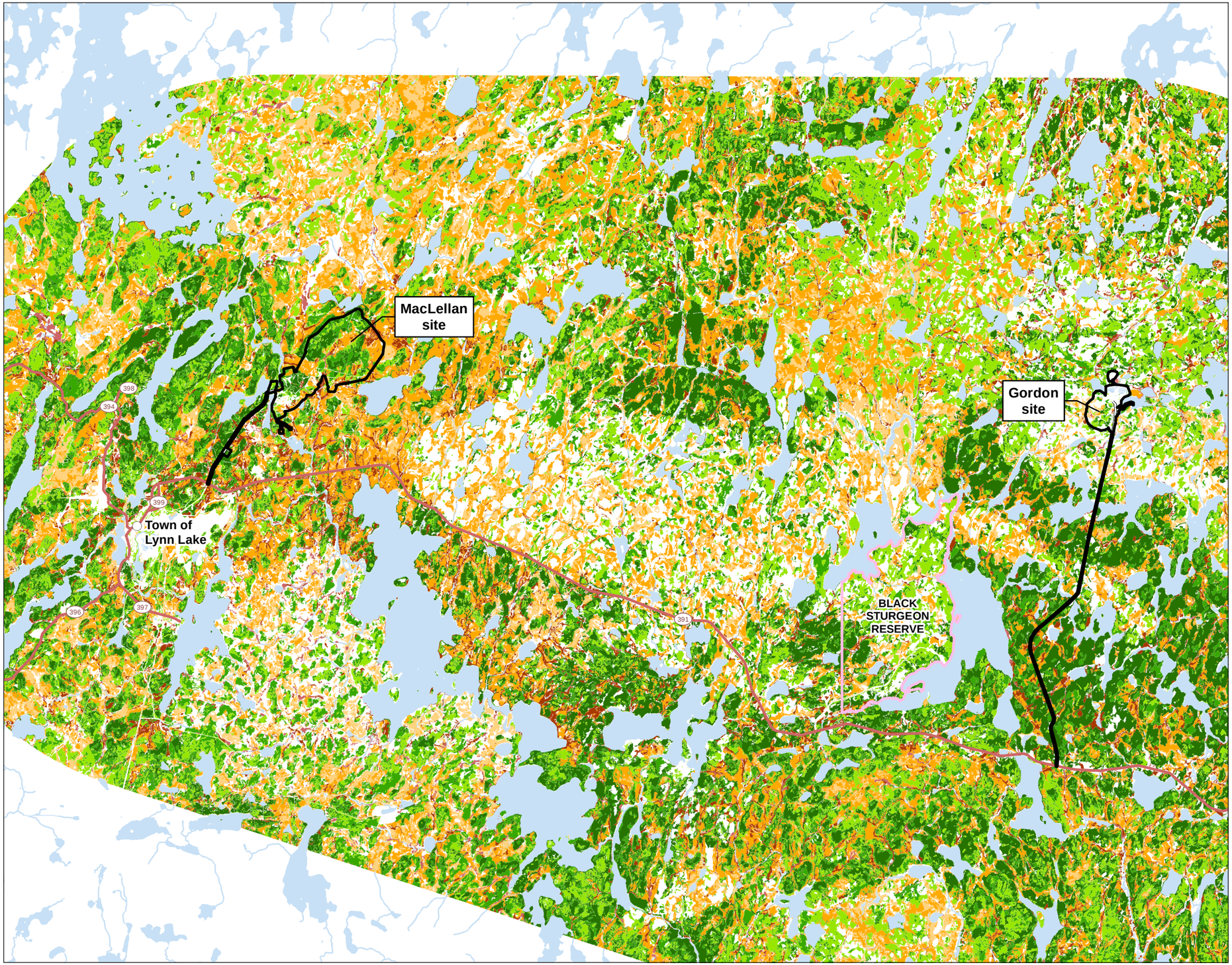


Photo 5 Gray Wolf Track Observed in the MacLellan Site PDA, June 2, 2024



Photo 6 Active Gray Wolf Den (red circle) Observed near the MacLellan Site PDA, May 31, 2024





Stantec

Project Infrastructure
- Project Development Area (PDA)

Potential Caribou Calving and Calf-rearing Habitat

Upland
- Conifer Dense
- Conifer Open
- Conifer Sparse

Wetland
- Bog Shrubby
- Bog Treed
- Swamp Shrubby
- Swamp Treed

Landbase
- Existing Access Road
- Highway
- Watercourse
- Waterbody
- First Nation Reserve

N

0 2.5 5 Kilometres

(At original document size of 11x17)
1:150,000

Notes
1. Coordinate System: NAD 1983 UTM Zone 14N
2. Base Data Sources: Government of Manitoba and Government of Canada.
3. Imagery: Land Use/Land Cover, Stantec 2017.

Project Location
Lynn Lake, Manitoba

Prepared by ACampigotto on 2024-07-02
Technical Review by AAmbrose on 2024-07-02

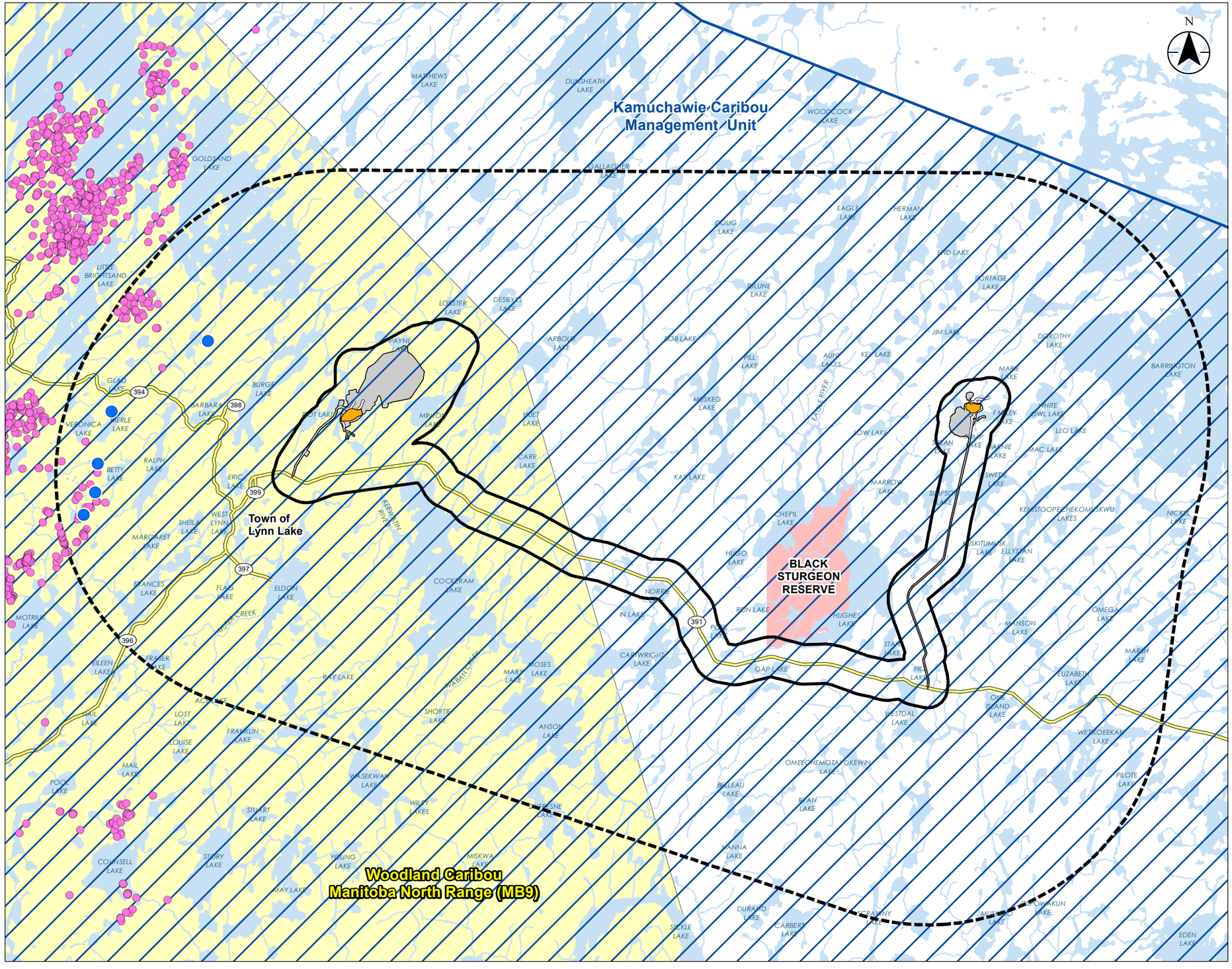
Client/Project
111473076

ALAMOS GOLD INC.
Lynn Lake Gold Project

Map No.
1

Title
Potential Caribou Calving and Calf-rearing Habitat

G:\ - GIS Project Folder\111473008 LGP EA\admin\data_mxd\STANTEC\20230808 Caribou Survey Transects\111473076_005_HabitatTypes_20240702.mxd Revised: 2024-07-08 By: ACampigotto



Stantec

Project Infrastructure
- Proposed Open Pit
- Project Development Area (PDA)

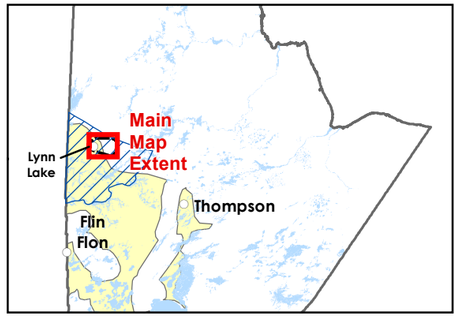
Survey Locations
- Caribou Detected on Camera (2024)
- Provincial Caribou Collaring Observations (March to December, 2023) *

** Confidential and Proprietary -- For Internal Use Only*

Study Area
- Local Assessment Area (LAA)
- Regional Assessment Area (RAA)

Caribou Ranges and Management Units
- Kamuchawie Caribou Management Unit
- Woodland Caribou Manitoba North Range (MB9)

Landbase
- Access Road
- Provincial Road
- Watercourse
- Waterbody
- First Nation Reserve



0 4 8 Kilometres

1:200,000 (At original document size of 11x17)

Notes
1. Coordinate System: NAD 1983 UTM Zone 14N
2. Base features provided by the Government of Manitoba and the Government of Canada.

Project Location
MacLellan and Gordon
Lynn Lake, Manitoba

111473084

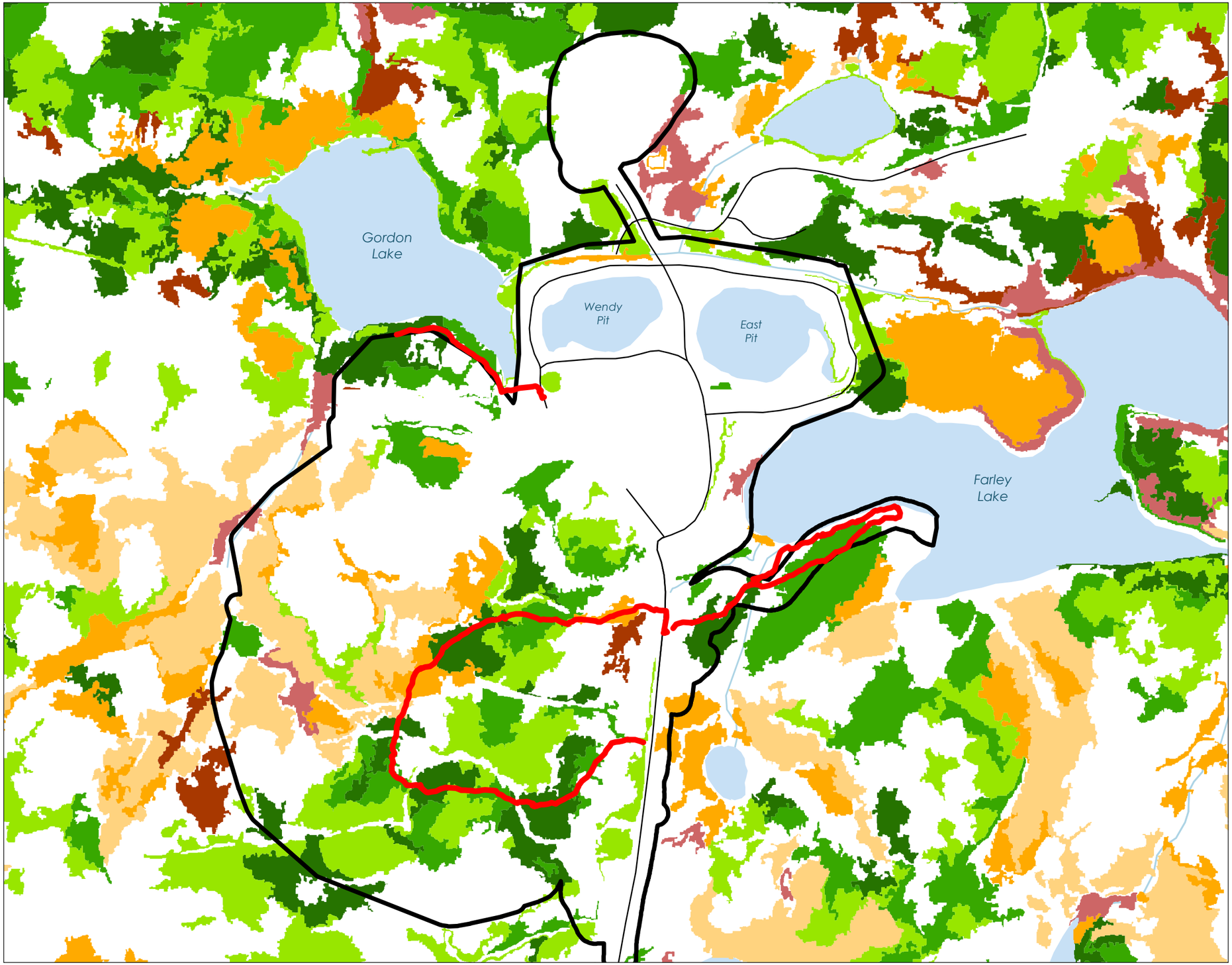
Prepared by ACampigotto on 2025-01-23
Technical Review by CMoszynski on 2025-01-23

Client/Project
ALAMOS GOLD INC.
Lynn Lake Gold Project

Map No.
2

Title
Woodland Caribou Observations in the RAA

G:\...\GIS_Project_Folder\111473008_LLGP_EA\admin\data_in\STANTEC\20230808_Caribou_Survey_Transects\111473074_009_Woodland_Caribou_Observations_20250123.mxd Revised: 2025-01-23 By: ACampigotto



Stantec

Project Infrastructure

Project Development Area (PDA)

Survey Locations

Survey Transects

Potential caribou calving and post-calving habitat

Upland

- Conifer Dense
- Conifer Open
- Conifer Sparse

Wetland

- Bog Shrubby
- Bog Treed
- Swamp Shrubby
- Swamp Treed

Landbase

- Existing Access Road
- Watercourse
- Waterbody

N

0 100 200 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.

Project Location
Lynn Lake, Manitoba

Prepared by ACampigotto on 2024-07-02
Technical Review by AAmbrose on 2024-07-02

Client/Project
ALAMOS GOLD INC.
Lynn Lake Gold Project

111473076

Map No.
3

Title
Caribou Calving Habitat Survey Transects - Gordon site

G:_GIS Project Folder\111473008 LLGP EA\admin\data_in\STANTEC\20230808_Caribou_Survey_Transects\111473076_003_Gordon_ProposedTransects_and_HabitatTypes_20240702.mxd Revised: 2024-07-02 By: ACampigotto



Stantec

Project Infrastructure

Project Development Area (PDA)

Survey Locations

Survey Transects

Potential caribou calving and post-calving habitat

Upland

- Conifer Dense
- Conifer Open
- Conifer Sparse

Wetland

- Bog Shrubby
- Bog Treed
- Swamp Shrubby
- Swamp Treed

Landbase

- Existing Access Road
- Watercourse
- Waterbody

N

0 0.5 1 Kilometres

(At original document size of 11x17)
1:25,000

Notes

1. Coordinate System: NAD 1983 UTM Zone 14N
2. Base Data Sources: Government of Manitoba and Government of Canada.

Project Location
Lynn Lake, Manitoba

Prepared by ACampigotto on 2024-07-02
Technical Review by AAmbrose on 2024-07-02

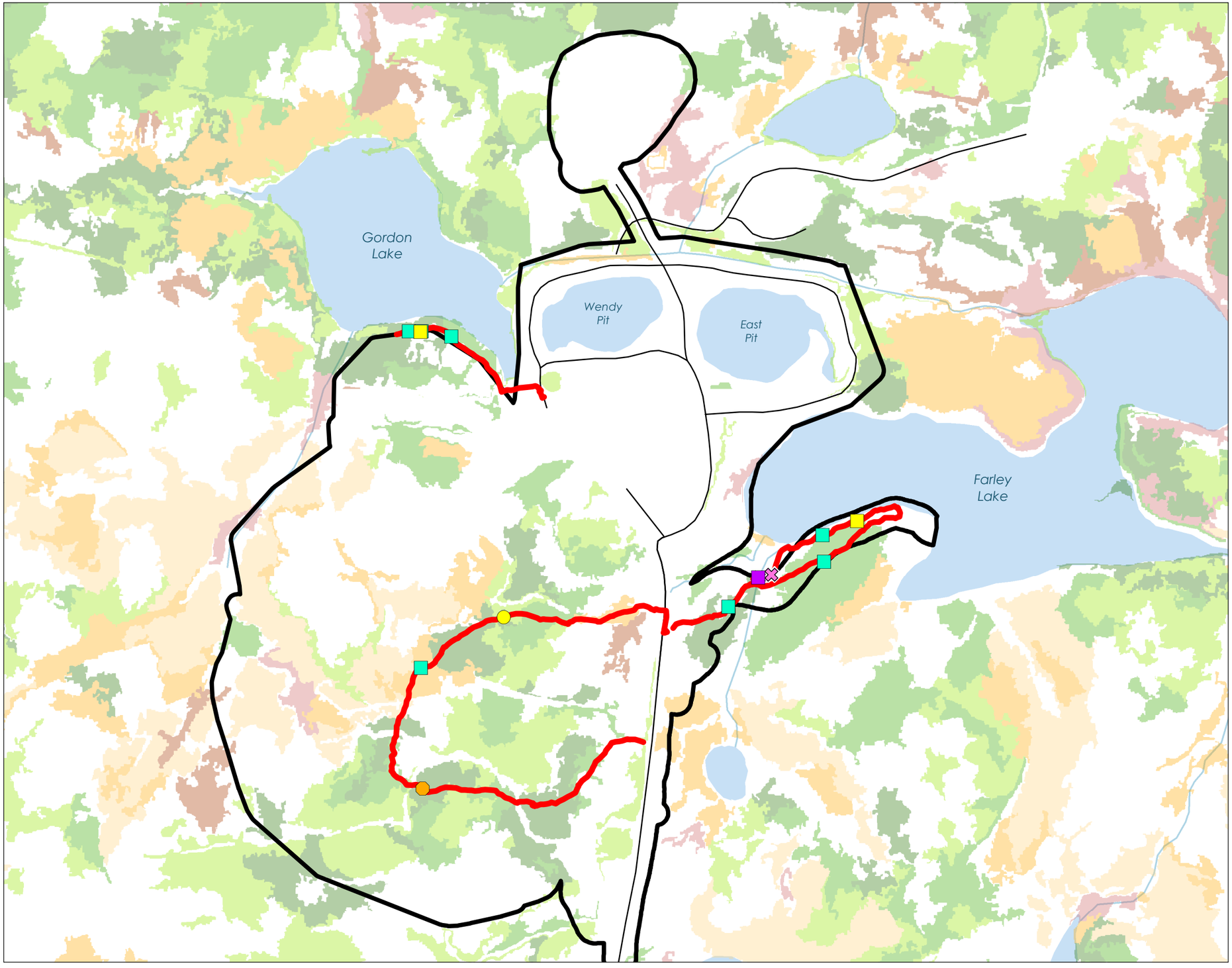
Client/Project
ALAMOS GOLD INC.
Lynn Lake Gold Project

111473076

Map No.
4

Title
Caribou Calving Habitat Survey Transects - MacLellan site

G:\...GIS Project Folder\111473008 LLGP EA\admin\data_in\STANTEC\20230808_Caribou_Survey_Transects\111473076_004_MacLellan_ProposedTransects_and_HabitatTypes_20240702.mxd Revised: 2024-07-02 By: ACampigotto



Stantec

Project Infrastructure

- Project Development Area (PDA)

Survey Results

- Black Bear Browse
- Black Bear Scat
- Canada Lynx Scat
- Game Trail
- Terrestrial and Arboreal Lichen
- Moose Scat
- Survey Transects

Potential caribou calving and post-calving habitat

Upland

- Conifer Dense
- Conifer Open
- Conifer Sparse

Wetland

- Bog Shrubby
- Bog Treed
- Swamp Shrubby
- Swamp Treed

Landbase

- Existing Access Road
- Watercourse
- Waterbody

N

0 100 200 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.

Project Location
Lynn Lake, Manitoba

Prepared by ACampigotto on 2024-06-17
Technical Review by AAmbrose on 2024-06-17

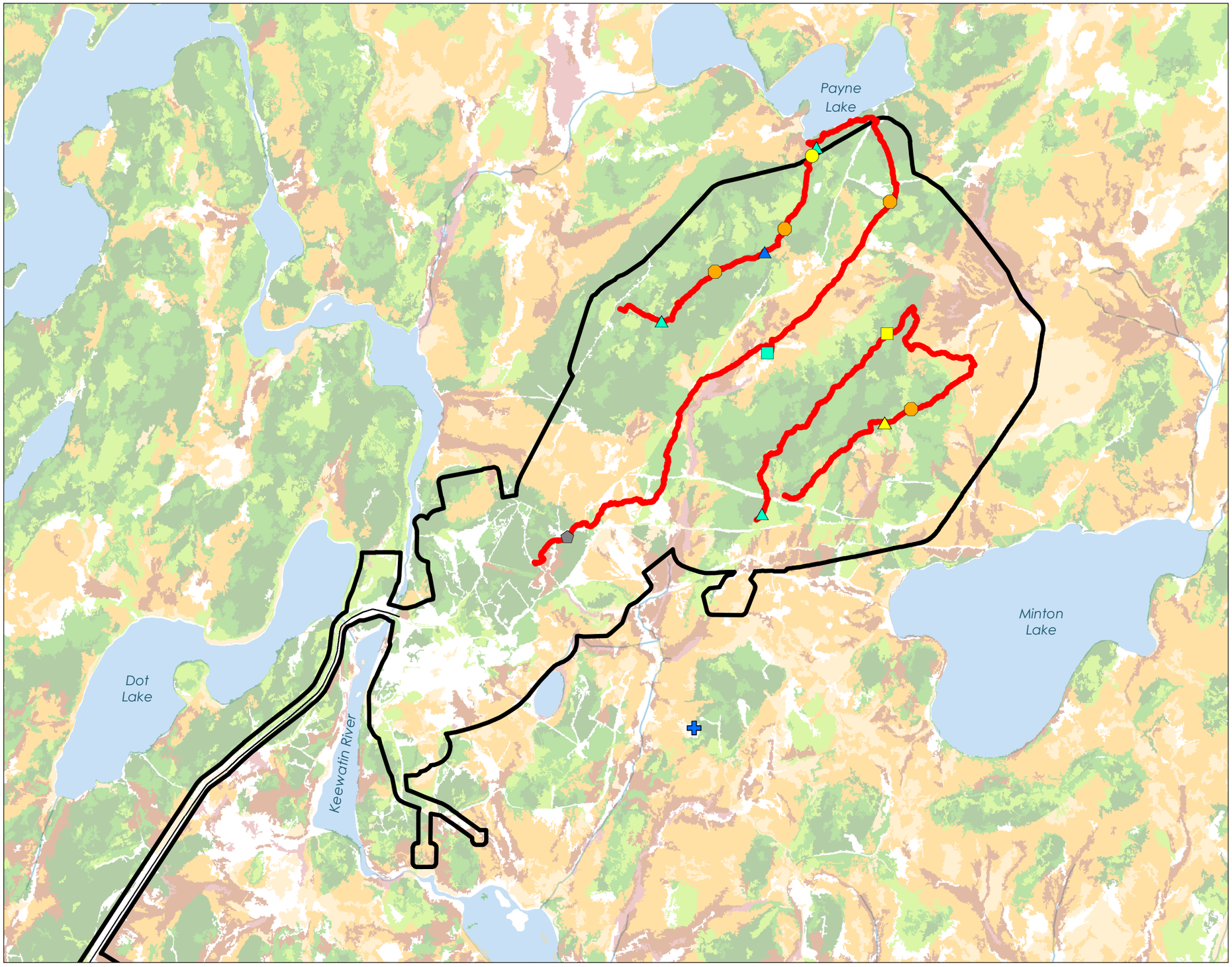
Client/Project
ALAMOS GOLD INC.
Lynn Lake Gold Project

111473076

Map No.
5

Title
Mammal Signs - Gordon site

G:_GIS_Project_Folder\111473008_LGP_EA\cdmm\data_in\STANTEC\20230808_Caribou_Survey_Transects\111473074_005_Gordon_ActualTransects_and_MammalSigns_20240702.mxd Revised: 2024-07-02 by: ACampigotto



Stantec

Project Infrastructure

- Project Development Area (PDA)

Survey Results

- Black Bear Browse
- Black Bear Scat
- Black Bear Track
- Gray Wolf Den
- Gray Wolf Track
- Terrestrial Lichen
- Moose Scat
- Moose Track
- Unknown Carnivore
- Survey Transects

Potential caribou calving and post-calving habitat

Upland

- Conifer Dense
- Conifer Open
- Conifer Sparse

Wetland

- Bog Shrubby
- Bog Treed
- Swamp Shrubby
- Swamp Treed

Landbase

- Existing Access Road
- Watercourse
- Waterbody

N

0 0.5 1 Kilometres

(At original document size of 11x17)
1:25,000

Notes

1. Coordinate System: NAD 1983 UTM Zone 14N
2. Base Data Sources: Government of Manitoba and Government of Canada.

Project Location
Lynn Lake, Manitoba

Prepared by ACampigotto on 2024-07-02
Technical Review by AAmbrose on 2024-07-02

Client/Project
ALAMOS GOLD INC.
Lynn Lake Gold Project

111473076

Map No.
6

Title
Mammal Signs - MacLellan site

G:_GIS Project Folder\111473008 LLGP EA\cdmm\data_in\STANTEC\20230808 Caribou Survey Transects\111473074 006 MacLellan Actual\Transects and Mammal Signs 20240702.mxd Revised: 2024-07-02 By: ACampigotto

Reference: Lynn Lake Gold Project Pre-Construction Monitoring: Caribou Calving and Calf-Rearing Habitat 2024

While there appears to be potentially suitable habitat for caribou calving and calf-rearing in the PDA, no evidence of caribou activity was found during the spring 2024 fecal pellet and track survey. The survey results do not confirm the absence of caribou; however, the large amount of existing disturbance; input from government biologists and local resource users; and the lack of caribou activity during this survey and during previous baseline and ongoing studies suggest that caribou do not use the PDA for calving and calf-rearing.

With completion of this work, condition 10.1 of the Decision Statement (issued under Section 54 of the *Canadian Environmental Assessment Act, 2012)* is considered to have been fulfilled.

Best regards,

STANTEC CONSULTING LTD.

Reference: Lynn Lake Gold Project Pre-Construction Monitoring: Caribou Calving and Calf-Rearing Habitat 2024

ATTACHMENT A – RESPONSES TO FEEDBACK RECEIVED ON THE SURVEY STUDY DESIGN

ALAMOS GOLD INC.

Lynn Lake Gold Project: Proposed Woodland Caribou Field Survey

Response to Manitoba Métis Federation's Comments

Stantec

Prepared by:

Stantec Consulting Ltd.

June 27, 2024

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Response to WCS-MMF-IR-01 2
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Response to WCS-MMF-IR-05 6

Introduction

Alamos Gold Inc. (Alamos) submitted the proposed Lynn Lake Gold Project (LLGP or the Project) Woodland Caribou Field Survey (WCS) to Manitoba Métis Federation (MMF) on May 24, 2024. MMF provided comments back to Alamos on June 20, 2024. This report provides responses to the MMF's comments and questions on the proposed LLGP WCS.

The methodology for this survey has been developed based on, and as dictated by, the specific Federal Decision Statement condition. The MMF and all other engaged Nations who have provided feedback have (through this feedback) been directly involved in the development of this survey methodology, which Alamos has considered and integrated as appropriate to meet the Federal Decision Statement condition. To that end, Alamos' responses provide a rationale as to why MMF's recommended modification of the proposed assessment is not warranted, but we thank the MMF for, and appreciate, the provided feedback.

Alamos is committed to discussing these responses and any additional comments or questions that the MMF may have on the WCS.

RESPONSE TO WCS-MMF-IR-01

ID:	**WCS-MMF-IR-01**
Expert Department or Group:	Manitoba Métis Federation
Information Request:	The MMF requires justification as to why the field surveys are only being conducted in the spring. This fails to capture a fulsome understanding of caribou land use in the PDAs over the year.
Response:	The Environmental Impact Statement (EIS) described caribou land use (or lack thereof) in the Project Development Areas (PDAs), Local Assessment Area (LAA), and Regional Assessment Area (RAA) of both the MacLellan and Gordon sites. Woodland caribou are not present in the site PDAs or the larger LAA. Alamos received the Federal Decision Statement and provincial Environment Act Licence approvals in March 2023. The regulatory findings matched the Environmental Impact Statement finding of no significant Project effects on woodland caribou (*Rangifer tarandus caribou*). MMF has reviewed all relevant assessment programs and outcomes throughout the EIS technical review process. Despite the lack of caribou presence in the LAA, and the Project Development Areas (PDAs) being mostly disturbed (directly and indirectly), Condition 10.1 of the Federal Decision Statement requires that "*The Proponent shall conduct, prior to construction and in consultation with Indigenous groups and relevant authorities, pre-construction surveys within the Project development areas to identify woodland caribou (Rangifer tarandus caribou) calving and calf-rearing habitat.*" Since the condition focuses on identifying calving and calf-rearing habitat, Alamos planned surveys to overlap the woodland caribou calving period, which is May through June. Alamos understands the importance of capturing a fulsome understanding of caribou land use in the PDA throughout all seasons and as such, has been monitoring for caribou and other wildlife year-round since 2015. See response to WCS-MMF-IR-02 for more information about other caribou survey work completed to date.

RESPONSE TO WCS-MMF-IR-02

ID:	**WCS-MMF-IR-02**
Indigenous Nation:	Manitoba Métis Federation
Information Request:	Alamos must justify their methodology and why other methods are not being used. i.e. trail cams, collaring, aerial/drone surveys.
Response:	The most appropriate method to identify calving habitat involves the use of caribou collaring data; however, this data was not made available to Alamos until recently and is still considered preliminary (animals collared only in last 1-2 years). For the caribou calving and calf-rearing field survey, it was determined that a ground-based fecal pellet survey would result in the least disturbance to caribou that may be present during the sensitive calving period. Other methods currently being used to understand caribou distribution and seasonal changes in habitat use include: • Thirty-two remote cameras placed throughout the PDA, LAA, and RAA for year-round monitoring beginning in April 2015 and continuing to the maintained regularly. Cameras have been re-positioned for pre-construction and construction monitoring to focus on the western portion of the RAA, where caribou presence has been detected. Cameras are also monitoring the LAA and the Gordon and MacLellan site PDAs. • The ongoing provincial radio-collaring program for year-round monitoring of woodland caribou in the Kamuchawie Caribou Management Unit, on which Alamos is collaborating. Previous methods to understand caribou distribution outside of the calving and calf-rearing period include: • Aerial track surveys completed in January 2016, February 2016, and February 2017 to provide information on the relative abundance and distribution of mammals in the PDA, LAA, and surrounding area, based on tracks and individuals observed. • Ground-based tracking surveys completed in December 2015, February/March 2016, December 2016, and February 2017 to gather baseline information on mammal relative abundance, diversity, and distribution in the RAA to supplement data gathered by the camera trap study. Alamos understands that MMF has additional data that could contribute to Alamos' efforts to protect the environment and culturally sensitive areas. If MMF is amenable, Alamos requests shapefiles or a map of the Indigenous Protected Conserved Area (IPCA), as Alamos is interested in adding to its sensitivity mapping database. Further, Alamos would welcome additional LLGP-specific woodland caribou data from MMF if available. Alamos also recommends MMF sharing these data with the province to enhance the understanding of woodland caribou abundance and distribution in the Kamuchawie Caribou Management Unit.

RESPONSE TO WCS-MMF-IR-03

ID:	**WCS-MMF-IR-03**
Indigenous Nation:	Manitoba Métis Federation
Information Request:	What data is Alamos trying to collect and how will this information be used in informing their project development?
Response:	The main purpose of the work was to comply with Condition 10.1 of the Federal Decision Statement. The specific objectives of the survey in relation to Condition 10.1 were to: • Identify and map potential woodland caribou calving and calf-rearing habitat within the PDA. • Identify signs of caribou activity, if any, in the potential calving and calf-rearing areas identified in the PDA. To examine whether potential calving and calf-rearing habitat in the PDA is occupied by caribou, surveys for caribou signs (tracks, scat) as an indication of occupancy and fresh scat as an indication of recent occupancy were proposed. Caribou presence during the calving period could affect the schedule or timing of Project construction and operation activities. As described in the Lynn Lake Gold Project: Wildlife Monitoring and Mitigation Plan, woodland caribou activity in the LAA during the calving season will require mitigation to reduce potential Project-related disturbance to caribou.

RESPONSE TO WCS-MMF-IR-04

ID:	**WCS-MMF-IR-04**
Indigenous Nation:	Manitoba Métis Federation
Information Request:	How does Alamos plan to address the limitations with scat monitoring i.e. environmental exposure of scat (DNA degradation)?
Response:	Pellets are considered a woodland caribou sign and are an element to assess presence/absence of woodland caribou in addition to recording other signs including tracks or visuals. The pellets are not proposed to be collected or considered for any DNA program.

RESPONSE TO WCS-MMF-IR-05

ID:	**WCS-MMF-IR-05**
Indigenous Nation:	Manitoba Métis Federation
Information Request:	What type of scat monitoring is Alamos planning to undertake i.e. full scat analysis or scat swabbing? Please provide justification for method selection.
Response:	Survey methods were developed based on Condition 10.1 of the Federal Decision Statement and do not include scat monitoring.

ALAMOS GOLD INC.

Lynn Lake Gold Project: Proposed Woodland Caribou Field Survey

Response to Environment and Climate Change Canada's Comments

Stantec

Prepared by:

Stantec Consulting Ltd.

June 26, 2024

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Response to WCS-ECCC-IR-04 6

Introduction

Alamos Gold Inc. (Alamos) submitted the proposed Lynn Lake Gold Project (LLGP or the Project) Woodland Caribou Field Survey (WCS) to Environment and Climate Change Canada (ECCC) on May 24, 2024. ECCC provided comments back to Alamos on June 25, 2024. This report provides responses to ECCC's comments and questions on the proposed LLGP WCS.

Alamos is committed to discussing these responses and any additional comments or questions that the ECCC may have on the WCS.

RESPONSE TO WCS-ECCC-IR-01

ID:	**WCS-ECCC-IR-01**
Expert Department or Group:	Environment and Climate Change Canada
Information Request:	ECCC notes that the window for calving has passed for 2024 (i.e. early May to mid-June), therefore surveys would be occurring during the calf rearing period.
Response:	The Environmental Impact Statement (EIS) described caribou land use (or lack thereof) in the Project Development Areas (PDAs), Local Assessment Area (LAA), and Regional Assessment Area (RAA) of both the MacLellan and Gordon sites. Woodland caribou are not present in the site PDAs or the larger LAA. Alamos received the Federal Decision Statement and provincial Environment Act Licence approvals in March 2023. The regulatory findings matched the Environmental Impact Statement finding of no significant Project effects on woodland caribou (*Rangifer tarandus caribou*). ECCC has reviewed all relevant assessment programs and outcomes throughout the EIS technical review process. Despite the lack of caribou presence in the LAA, and the PDAs being mostly disturbed (directly and indirectly), Condition 10.1 of the Federal Decision Statement requires that "*The Proponent shall conduct, prior to construction and in consultation with Indigenous groups and relevant authorities, pre-construction surveys within the Project development areas to identify woodland caribou (Rangifer tarandus caribou) calving and calf-rearing habitat.*" Since the condition focuses on identifying calving and calf-rearing habitat, Alamos planned surveys to overlap the woodland caribou calving period, which is May through June. Recognizing the narrow timeline, Alamos conducted the survey between May 28 and June 3, 2024, which it deemed to fall within the calving and calf-rearing period. It is noted that the survey was completed in parallel to the Nation and regulatory engagement process. Understanding there could be feedback received after the survey was completed, Alamos was prepared to potentially repeat a pre-construction survey (with an altered survey approach), if required. In consideration to all of the feedback received, Alamos believes it has met the conditional requirement prior to construction and no further surveys are required. Alamos understands the importance of capturing a fulsome understanding of caribou land use in the PDA throughout all seasons and as such, has been monitoring caribou and other wildlife year-round since 2015 (see response to WCS-ECCC-IR-02).The conditional required survey appears to be supplemental in nature, and specific to the historically disturbed site PDAs, where there is no record of woodland caribou as of 2015 (and earlier based on Indigenous Knowledge). Alamos' comprehensive Wildlife Monitoring and Mitigation Plan (WMMP) incorporates caribou mitigations and adaptive procedures. Alamos is also negotiating with the Province of Manitoba to take part in the provincial collaring program for woodland caribou, which will provide better information on movement, especially during the calving and calf-rearing time window.

RESPONSE TO WCS-ECCC-IR-02

ID:	**WCS-ECCC-IR-02**
Expert Department or Group:	Environment and Climate Change Canada
Information Request:	The survey area provided by the proponent is very narrow and unlikely to contain calving caribou due to the existing disturbance at the mine site. A more appropriate scale to identify and map caribou calving and calf-rearing habitat would be at the regional assessment area (RAA) scale. There is evidence that caribou avoid areas up to 4 kilometers from mine sites (Weir et.al. 2007. Effects of Mine Development on Woodland Caribou Rangifer Tarandus Distribution. Wildlife Biology: 13 pp 66-74).
Response:	It is agreed that there is no evidence that caribou are present within the LAA or the PDA. Condition 10.1 of the Federal Decision Statement, however, specifically requires surveys within the PDA: "*The Proponent shall conduct, prior to construction and in consultation with Indigenous groups and relevant authorities, pre-construction surveys within the Project development areas to identify woodland caribou (Rangifer tarandus caribou) calving and calf-rearing habitat.*" The most appropriate method to identify calving habitat involves the use of caribou collaring data; however, this data was not made available to Alamos until recently (June 24, 2024) and is still considered preliminary (animals collared only in last 1-2 years). Alamos is negotiating as per Condition 10.3.1 with the Province of Manitoba to contribute with their collaring program. The main purpose of the work was to comply with Condition 10.1 of the Federal Decision Statement. The specific objectives of the survey in relation to Condition 10.1 were to: • Identify and map potential woodland caribou calving and calf-rearing habitat within the PDA. • Identify signs of caribou activity, if any, in the potential calving and calf-rearing areas identified in the PDA. Aside of the proposed conditionally required survey, current and past efforts to understand caribou distribution and seasonal changes in habitat use include: • Thirty-two remote cameras placed throughout the PDA, LAA, and RAA for year-round monitoring beginning in April 2015 and continuing to the maintained regularly. Cameras have been re-positioned for pre-construction and construction monitoring to focus on the western portion of the RAA, where caribou presence has been detected. Cameras are also monitoring the LAA and the Gordon and MacLellan site PDAs. • The ongoing provincial radio-collaring program for year-round monitoring of woodland caribou in the Kamuchawie Caribou Management Unit, on which Alamos is collaborating. Previous methods to understand caribou distribution outside of the calving and calf-rearing period include: • Aerial track surveys completed in January 2016, February 2016, February 2017 and January 2019 to provide information on the relative abundance and distribution of mammals in the PDA, LAA, and surrounding area, based on tracks and individuals observed.

ID:	WCS-ECCC-IR-02
	• Ground-based tracking surveys completed in December 2015, February/March 2016, December 2016, and February 2017 to gather baseline information on mammal relative abundance, diversity, and distribution in the RAA to supplement data gathered by the camera trap study.

RESPONSE TO WCS-ECCC-IR-03

ID:	**WCS-ECCC-IR-03**
Indigenous Nation:	Environment and Climate Change Canada
Information Request:	Lack of occupancy does not mean that the areas are not caribou calving habitat. Caribou calving areas can vary spatially and temporally by year. Caribou habitat is identified by the biophysical attributes that the habitat possesses. As such, a single spring/summer survey is unlikely to yield robust data.
Response:	Alamos acknowledges the variability (spatially and temporally) and has developed a robust monitoring and mitigation plan including triggers and adaptive management procedures if caribou are present in the LAA throughout the life of mine. This is outlined in Alamos' WMMP,which was submitted for feedback to ECCC and CWS on May 6, 2024. As per the WMMP, if identified, woodland caribou activity in the LAA during the calving season will require mitigation to reduce potential Project-related disturbance to caribou. As previously noted, the main purpose of the work was to comply with Condition 10.1 of the Federal Decision Statement. The specific objectives of the survey in relation to Condition 10.1 were to: • Identify and map potential woodland caribou calving and calf-rearing habitat within the PDA. • Identify signs of caribou activity, if any, in the potential calving and calf-rearing areas identified in the PDA. For the caribou calving and calf-rearing field survey, it was determined that a ground-based fecal pellet survey would result in the least disturbance to caribou that may be present during the sensitive calving period.

RESPONSE TO WCS-ECCC-IR-04

ID:	**WCS-ECCC-IR-04**
Indigenous Nation:	Environment and Climate Change Canada
Information Request:	Fecal pellet and track surveys are relatively ineffective in spring/summer due to the difficulty in locating them. A more appropriate method to identify calving habitat is through collaring caribou and pairing this with a Resource Selection Function.
Response:	The main purpose of the work was to comply with Condition 10.1 of the Federal Decision Statement. Since the condition focuses on identifying calving and calf-rearing habitat, Alamos planned surveys to overlap the woodland caribou calving period, which is May through June. It is agreed that the most appropriate method to identify calving habitat involves the use of caribou collaring data; however, this data was not made available to Alamos by the Province of Manitoba until recently (June 24, 2024) and is still considered preliminary (animals collared only in last 1-2 years). Alamos is negotiating as per Condition 10.3.1 with the Province to contribute with their collaring program.