

To: Impact Assessment Agency of Canada (IAAC) From: Alamos Gold Inc. (the Proponent)
Project/File: 111473033 Date: December 6, 2022

Reference: Proponent Review of the Lynn Lake Gold Project Draft Environmental Assessment and Potential Terms and Conditions

The Impact Assessment Agency of Canada (IAAC) has completed their Environmental Assessment (EA) report¹ and potential terms and conditions² (T&Cs) of the EA for the Alamos Gold Lynn Lake Gold Project (LLGP or the Project). The draft EA report and the T&Cs were reviewed with respect to the assessment of potential effects of the LLGP.

The following provides the Proponent’s comments and recommendations on the draft EA report and potential T&Cs. The comments and recommendations are ranked as follows:

- “Recommendation” – a suggestion made to the EA report and/or T&C authors.
- “Deviation” – a noted error or discrepancy between either the draft EA report and Alamos Gold Inc. (Alamos; the Proponent) submitted materials (specifically the Environmental Impact Statement or Information Request responses) or between the draft EA report and the potential T&Cs.
- “Key Issue” – a recommendation or requirement that as currently written is a challenge to meet and if unchanged has the potential to be a Project showstopper.
- “Showstopper” – a recommendation or requirement that as written is not technically and/or economically feasible and if remains, ends the potential for the LLGP to proceed (“poison pill”).

Alamos appreciates the opportunity to provide IAAC with comments and recommendations and is open to discussing any of the following to reach agreement and continue to advance the Project successfully.

Regards,

Alamos Gold Inc.

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¹ Impact Assessment Agency of Canada (IAAC). 2022. Lynn Lake Gold Project Draft Environmental Assessment Report. November 2022.

² Impact Assessment Agency of Canada (IAAC). 2022. Potential Conditions Under the *Canadian Environmental Assessment Act*, 2012. November 2022.

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Draft Environmental Assessment Report

Executive Summary

Item	Section	Rank	Excerpt	Comment	Suggestion
1	Executive Summary	Deviation	<i>The associated metal mill would have an ore input capacity of 8,000 tonnes per day over a 13-year period.</i>	8,000 tonnes per day is not consistent with the EIS. The EIS states that: <i>The ore milling and processing plant is designed to process 7,500 t/day of ore, with a maximum potential process rate of 8,250 t/day.</i>	Please replace “8,000 tonnes per day” with “a maximum potential process rate of 8,250 tonnes per day”.
2	Executive Summary	Recommendation	<i>...continual engagement with Indigenous nations, including with respect to monitoring and access management;...</i>	Indigenous Nations should be capitalized.	<u>Global Edit</u> : please replace Indigenous “nations” with Indigenous “Nations” throughout the EA report.
3	Executive Summary	Recommendation	<i>...and development of an Indigenous Environmental Advisory Committee to support ongoing engagement and information sharing.</i>	Please delete the word "Indigenous" to align with the Project Provincial Environment Act Licence (EAL) conditions.	<u>Global Edit</u> : please replace “Indigenous Environmental Advisory Committee” with “Environmental Advisory Committee” throughout the EA report.
4	Executive Summary	Key issue	<i>Any conditions established by the Minister would become legally binding on the Proponent. In addition, it is the Agency’s expectation that all of the Proponent’s commitments would be implemented in order for the Project to be carried out in a careful and precautionary manner.</i>	<p>In several places throughout the EA report, there appears to be a distinction being made between “key mitigations” and “other” mitigations, which is unclear and confusing. It is also unclear as to the relationship between 1) the legally binding EA conditions 2) “key mitigation” and follow-up in the EA report and 3) “other” mitigation and follow-up in the proponent’s EIS that may be a matter of due diligence and not necessarily legally binding.</p> <ul style="list-style-type: none"> Is there a difference between the key mitigation and other mitigation, which is legally binding, and for which there is an expectation to be implemented (but may not be legally binding)? Additionally, are all of the items identified as key mitigation (and follow-up) rolled over into the EA draft conditions (which are clearly legally binding)? 	IAAC is asked to please clarify the differences, if any, among the types of mitigation.

Section 1 – Introduction

Item	Section	Rank	Excerpt	Comment	Suggestion
5	Section 1	Deviation	<i>The Ore Milling and Processing Plant associated with the Project is expected to have an ore input capacity of 8,000 tonnes per day and an estimated operational life of 13 years.</i>	8,000 tonnes per day is the incorrect number. The EIS states that: <i>The ore milling and processing plant is designed to process 7,500 t/day of ore, with a maximum potential process rate of 8,250 t/day.</i>	Please replace “8,000 tonnes per day” with “a maximum potential process rate of 8,250 tonnes per day”.

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6	Section 1	Deviation	<i>The total footprint of the Gordon and MacLellan site Project Development Areas (PDA) would be approximately 270 hectares and 940 hectares, respectively.</i>	The total footprint of the MacLellan site PDA is incorrect.	Please replace “940 hectares” with “910 hectares”.

Section 2 – Project Overview

Item	Section	Rank	Excerpt	Comment	Suggestion
7	Section 2.2.1	Deviation	<i>After closure of the historical mine, the Gordon site was reclaimed and most of the buildings and mining infrastructure were removed. The Gordon site currently consists of a 15-kilometre gravel access road, a bridge across the Hughes River, two water-filled open pits (i.e., the Wendy and East pit lakes), a diversion channel between Gordon Lake and Farley Lake, two capped mine rock storage areas, and two capped overburden storage areas. All other buildings and infrastructure have been removed.</i>	<p>This requires alignment with the Environmental Impact Statement (EIS) and should include that the access road is gated.</p> <p>This is a known concern for local Indigenous Nations and this section should also include that access will not change.</p>	Please add the following sentence to the end of this paragraph. <i>“Following closure, the access road to the Gordon site has been gated and access for local Indigenous Nations and the public has been restricted.”</i>
8	Section 2.2.1	Recommendation	<i>During pre-production years (i.e., the first two years of operation), mine rock, overburden, and ore would be removed from the open pit and stored in the mine rock storage area and overburden and ore stockpiles at the Gordon site.</i>	This should mention that for the LLGP, Alamos will have to dewater the existing flooded pits.	Please revise to say <i>“During pre-production years (i.e., the first two years of operation), the flooded existing open pit will be dewatered, and subsequently mine rock, overburden, and ore...”</i>
9	Section 2.2.1	Deviation	<i>Power for the Gordon site would be supplied on site via two 300-kilowatt diesel generators, connected to 4.16 kilovolt overhead distribution lines. Site lighting from power line pole-mounted fixtures and building mounted fixtures would be designed to reduce spill-over light.</i>	This requires alignment with the EIS.	Please revise to <i>“Power for the Gordon site would be supplied on site via two 300-kilowatt diesel generators, connected to 4.16 kilovolt overhead distribution lines, cable tray and underground conduits, with local outdoor type e-houses for transformers and load centres at each point of utilization.”</i>
10	Section 2.2.1	Recommendation	<i>Internal site access roads would be decommissioned following operation.</i>	As per the T&Cs, this would only be the case if the government, local Indigenous Nations and other stakeholders do not see a need to keep the road for continuous access to specific areas.	As local Indigenous Nations and stakeholders may wish to have these internal site access roads remain following operation for continuous access to the site, please revise this statement as follows: <i>“Internal site access roads would be</i>

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					<i>decommissioned following operation, unless otherwise requested.</i>
11	Section 2.2.1	Recommendation	<i>The water intake pipe would be located in the western basin of Farley Lake; a withdrawal rate of three litres per second would be required during operation.</i>	This requires alignment with the EIS.	Please revise to “...a withdrawal rate of ten cubic metres per hour would be required during operation.”
12	Section 2.2.2	Deviation/Key Issue	<i>The Crushing Plant and conveyors would be fully enclosed and dust collection systems would be installed to limit fugitive dust emissions.</i>	This requires alignment with the EIS. Conveyors will be covered but may not be fully enclosed.	Please revise to “The following Project components will be enclosed to reduce fugitive dust emissions: mill feed storage area, crushing plant conveyors and the fine ore stockpile. Particulate matter (PM) emissions will be reduced using dust collection/control systems (e.g., baghouse) at the primary crusher and the processing plant gold room. A wet scrubber will be used to reduce PM emissions from the secondary crusher.”
13	Section 2.2.2	Showstopper	<i>A circuit to remove sulphides from tailings during decommissioning/closure may also be installed.</i>	It is not clear where this statement came from. A circuit to remove sulphides has not been proposed and is not economically or technically feasible. It would destabilize the tailings management area and possibly remobilize associated contained contaminants.	Please delete this statement.
14	Section 2.2.2	Recommendation	<i>The volume of sanitary wastewater generated and to be treated at the Plant would be approximately 60,000 litres per day.</i>	As per IAAC-R3-02, the total capacity of the sewage treatment plant is anticipated to be 100 m ³ /day. This statement should include a volume of 100,000 litres per day to be consistent with the Provincial EAL.	Please revise to “...would be approximately 100,000 litres per day.”

Section 3 – Purpose of and Alternative Means of Carrying out the Project

Item	Section	Rank	Excerpt	Comment	Suggestion
15	Section 3.2	Recommendation	<i>Section 3.2.1 Proponent’s Alternatives Assessment regarding Mine Waste Disposal of EA Report (p. 40) says use of a soil over the mine rock storage areas and Tailings Management Facility following operations was selected as the preferred option. 3.2.2 Views Expressed (p.40) Federal authorities expressed their concerns of soil cover erosion overtime on top of the</i>	The EA report uses the term engineered soil cover; however, this term is not defined. Natural soil covers can erode during extreme weather events, but the Soil Management and Rehabilitation Plan and Vegetation and Weed Plan for the LLGP will include a re-seeding and re-vegetation plan on mine features with a long-term goal to create a self-sustaining environment.	Please include a definition for the term ‘engineered soil cover’ in the EA report.

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			<p><i>mine rock stockpile areas and tailings management facility. They mention that the Proponent did not consider that engineered soil covers may erode faster given the effects of climate change on precipitation patterns and extreme weather events. Natural Resources Canada recommended backfilling of the open pit to dispose of mine rock waste and tailings.</i></p> <p><i>3.2.3 (p. 41) The Agency is satisfied that the Proponent sufficiently assessed alternative means of carrying out the Project for the purposes of assessing the environmental effects of the Project under CEAA 2012.</i></p>		
16	Section 3.2.1	Key Issue	<p><i>For the MacLellan site, the preferred options chosen were to upgrade and convert the existing Copper Street Station in the Town of Lynn Lake</i></p>	<p>This is not technically correct. Manitoba Hydro will be upgrading the existing Copper Street Station and Alamos will be building a new substation in Lynn Lake next to the Copper Street Station and delivering power via a new line, along existing rights of way, to the MacLellan site.</p>	<p>Please revise to “<i>For the MacLellan site, the options chosen were for Manitoba Hydro to upgrade the existing Copper Street Station, and Alamos to build a new substation next to the Copper Street Station and deliver power through a new line (along existing rights of way) to the MacLellan site.</i>”</p>
17	Section 3.2.1	Deviation	<p><i>Seepage from the ore, overburden, and mine rock storage areas would be directed to the Tailings Management Facility; no other alternatives were considered.</i></p>	<p>This statement is incorrect. Seepage from the ore, overburden, and mine rock storage areas will be collected in a series of contact water collection ditches. At the MacLellan site, the collected contact water will be used in mill processing and/or directed to the tailings management facility. At the Gordon site, the collected contact water would be directed to a main water management pond for compliance monitoring prior to discharge.</p>	<p>Please revise to “<i>Seepage from the ore, overburden, and mine rock storage areas would be collected in a series of contact water collection ditches. At the MacLellan site, collection of seepage and runoff from the plant site stockpiles, topsoil stockpile, overburden stockpile and approximately 55% of the MRSA will be pumped to the collection pond for monitoring prior to discharge to the environment. The remaining seepage and runoff from the MRSA is directed to the tailings management facility. At the Gordon site, the collected contact water would be directed to a main water management pond for compliance monitoring prior to discharge.</i>”</p>

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Section 4 – Consultation and Engagement Activities

Item	Section	Rank	Excerpt	Comment	Suggestion
18	Section 4.2	Deviation	<i>The Proponent's engagement with Indigenous nations began in 2017 with the following Nations:</i>	This statement is not entirely true as the Proponent's engagement with Marcel Colomb First Nation began much earlier.	Please revise as follows: " <i>The Proponent's engagement with Indigenous Nations that are potentially affected by or interested in the Project began in 2014. Following the direction provided by the Agency in the Guidelines for the Preparation of an Environmental Impact Statement for the Project (2017), the Proponent's engagement has included the following Indigenous Nations:</i> "

Section 5 – Existing Ecosystem

Item	Section	Rank	Excerpt	Comment	Suggestion
19	Section 5.2	Recommendation	<i>The Town of Lynn Lake and Marcel Colomb Cree Nation's Black Sturgeon Reserve are located approximately 55 kilometres west and 5.6 kilometres southwest of the Gordon site, respectively, and eight kilometres southwest and 22 kilometres southeast of the MacLellan site, respectively.</i>	Marcel Colomb Cree Nation is incorrect and should be corrected to Marcel Colomb <u>First</u> Nation. Black Sturgeon Reserve should be changed to Black Sturgeon Reserve lands.	<u>Global Edit:</u> please confirm the names of Indigenous Nations are spelled correctly throughout the EA report and correct those that are spelled incorrectly. <u>Global Edit:</u> please change all references to "Black Sturgeon Reserve" to "Black Sturgeon Reserve <u>lands</u> ".
20	Section 5.2	Deviation	<i>The Town of Lynn Lake and Marcel Colomb Cree Nation's Black Sturgeon Reserve are located approximately 55 kilometres west and 5.6 kilometres southwest of the Gordon site, respectively, and eight kilometres southwest and 22 kilometres southeast of the MacLellan site, respectively.</i>	It should be included that residences are a greater distance from the LLGP than the distance to the Reserve lands border. The distances included do not accurately describe the distance to day-to-day people presence.	Please revise as follows: " <i>The Town of Lynn Lake is located approximately 55 kilometres west of the Gordon site and 8 kilometres southwest of the MacLellan site. Marcel Colomb First Nation's Black Sturgeon Reserve lands are located approximately 5.6 kilometres southwest of the Gordon site, and 22 kilometres southeast of the MacLellan site, respectively. However, the actual residences on the Black Sturgeon Reserve lands are located an additional 5 kilometres distance from both the Gordon and MacLellan sites (i.e., 10.6 km from the Gordon site and 27 km from the MacLellan site).</i> "
21	Section 5.2	Recommendation	<i>Through the Proponent's Indigenous engagement program, Mathias Colomb Cree Nation and Marcel Colomb Cree Nation indicated that their citizens</i>	Manitoba Metis Federation refers to their members as citizens.	<u>Global Edit:</u> Please replace "members" with "citizens" throughout the EA report in relation to Manitoba Metis Federation.

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			<i>continue to use the PDAs to support traditional and cultural activities.</i>		
22	Section 5.2	Deviation	<i>There are several remote cabins within the Gordon and MacLellan site LAAs, some of which are unoccupied, temporarily or seasonally used, or permanently used.</i>	The information obtained by the Proponent through the Indigenous engagement program for the Project indicated that the cabins in the LAA are used temporarily or seasonally. Alamos has received no information that any cabins in the LAA are used permanently.	Please delete "..., or permanently used" or specify location/source if new information received by the Agency through their consultation discussions.

Section 6 – Predicted Changes to the Environment

Item	Section	Rank	Excerpt	Comment	Suggestion
23	Section 6.1.1	Deviation	<i>The Proponent predicted that project-related emissions of PM₁₀, NO₂, CO and SO₂ during construction would result in exceedances of the Manitoba Ambient Air Quality Criteria (AAQC) and the Canadian Ambient Air Quality Standards (CAAQS) at the Gordon and MacLellan sites. These exceedances would occur for a maximum of two hours per year at the northeast PDA boundary at the Gordon site and the south PDA boundary at the MacLellan site. The maximum concentrations of all other air contaminants were not predicted to exceed the applicable Manitoba AAQC or CAAQS at either project site and concentrations of all atmospheric contaminants at receptor locations at the Black Sturgeon Reserve were predicted to be below the Manitoba AAQC and CAAQS.</i>	The second paragraph of Section 6.1.1 of the EA report describes model results for PM ₁₀ , NO ₂ , CO and SO ₂ during construction. However, Project emissions were not modelled for the construction phase because the emissions during construction are estimated to be lower than the emissions during operation. The information presented is inaccurate.	Please replace the second paragraph of Section 6.1.1 with: " <i>The Proponent estimated that project-related emissions during construction will be lower than the emissions during project operation. Therefore, the air contaminant concentrations during construction would be lower than the predicted concentrations during project operation.</i> "
24	Section 6.1.1	Deviation	<i>During operation ... At the MacLellan site, maximum 1-hour average NO₂ and 24-hour average total suspended particulate and PM₁₀ concentrations were predicted to exceed Manitoba AAQC and CAAQS limits along the PDA boundary (Table 3); exceedances would occur one day per year with increasing distance from the PDA boundary</i>	The exceedances in Table 3 are correct but the sentence "exceedances would occur one day per year with increasing distance from the PDA boundary" is not correct. The maximum number of exceedances on the Project boundary are presented in Table 3 and the number of exceedances will reduce from the Table 3 maximum with increasing distance from the PDA boundary.	Please replace "...;exceedances would occur one day per year with increasing distance from the PDA boundary" with "...;the number of exceedances will reduce to one day per year with increasing distance from the PDA boundary"

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25	Section 6.1.2	Showstopper	<i>Environment and Climate Change Canada expressed concerns regarding project-related air contaminants and GHG emissions and recommended that the Proponent abide by Tier 4 emissions standards for all phases of the Project and use Tier 4 engines in all equipment."</i>	Tier 4 equipment is expected to be used during operation, but the majority of the construction off-road equipment will be rented and could include older equipment. Therefore, the Proponent cannot ensure that all equipment and vehicles used during all phases of the Project will meet Tier 4 emission standards. If required to meet Tier 4 emission standards then some potential suppliers, including Indigenous partners, would no longer be able to supply services during any Project phase.	Understanding that this is a summary of what ECCC has said, no suggestions are provided, however, please see Item 28.
26	Section 6.1.2	Deviation	<i>Health Canada and Environment and Climate Change Canada expressed concerns regarding predicted project-related exceedances of the CAAQS limits for NO₂ and PM_{2.5}...</i>	This statement is inaccurate; no exceedances of the PM _{2.5} CAAQS limits were predicted.	Please replace with "Health Canada and Environment and Climate Change Canada expressed concerns regarding predicted project-related exceedances of the CAAQS limits for NO ₂ ."
27	Section 6.1.2	Key Issue	<i>Environment and Climate Change Canada also suggested that monitoring of NO₂ concentrations for the life of the Project be required to inform adaptive management</i>	As agreed with ECCC and Health Canada (HC) (meeting with ECCC and HC on April 29, 2022) and as described in the response to IAAC-R2-91, a two-month ambient air quality monitoring program to measure NO ₂ concentrations will be conducted during Project operation to validate the predictions of the atmospheric dispersion model. Ambient air quality monitoring of NO ₂ will not be conducted continuously for the life of the Project.	Please replace with "Environment and Climate Change Canada also suggested continuous monitoring of NO ₂ concentrations for two months during Project operation to validate the predictions of the atmospheric dispersion model."
28	Section 6.1.3	Showstopper	<i>The Agency agrees with the recommendations of Environment and Climate Change Canada and Health Canada with respect to the use of Tier 4 engines, requirements for NO₂ monitoring, implementation of additional mitigation measures to reduce NO₂ and PM_{2.5} emissions to the extent possible to be protective of human health, and mitigation and monitoring for noise.</i>	As per the comments under Item 25 above, the Proponent needs to ensure that local businesses who may not be able to comply can participate in the Project - i.e., Tier 4 should not be a condition but a target to strive towards or to comply with where feasible.	Please replace with "The Agency agrees with the recommendations of Environment and Climate Change Canada and Health Canada with respect to the use of Tier 4 engines (except where presenting a barrier to local supplier/subcontractor involvement and/or Indigenous participation), requirements for two continuous months of NO ₂ monitoring, implementation of additional mitigation measures to reduce NO ₂ and PM _{2.5} emissions to the extent possible to be protective of human health, and mitigation and monitoring for noise."
29	Section 6.1.3	Recommendation	<i>A follow-up program will be developed, prior to construction and in consultation with relevant federal and provincial authorities and Indigenous nations, that</i>	To limit potential confusion between the Proponent's engagement activities and the Crown's duty to consult (Constitution Act section 35), it is recommended that where it is used to refer to Alamos' "consultation with	Global Edit: please replace "consultation with Indigenous Nations" with "through engagement with local

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			<i>outlines technically and economically feasible mitigation measures to manage and reduce GHG emissions throughout all phases of the Project.</i>	Indigenous Nations”, that “consultation with...” be replaced with “through engagement with local Indigenous Nations”.	<i>Indigenous Nations”</i> throughout the EA report.
30	Section 6.1.3	Key Issue	<i>The Proponent will report annual project related GHG emissions to Environment and Climate Change Canada.</i>	GHG emissions will be reported if those emissions are greater than the reporting threshold as outlined in the response to IAAC-127.	Please replace with: <i>“The Proponent will report annual project-related GHG emissions to Environment and Climate Change Canada if those emissions are greater than the reporting threshold.”</i>
31	Section 6.1.3	Recommendation	<p><i>A follow-up program will be developed, prior to construction, in consultation with relevant federal and provincial authorities and Indigenous nations, and implemented during all phases, which will provide a framework for:</i></p> <ul style="list-style-type: none"> <i>monitoring ambient air concentrations of total suspended particulate, PM10, NO2 and PM2.5 concentrations continuously, taking into account 24-hour and 1-hour CAAQS thresholds, during construction and operation on Marcel Colomb First Nation’s Black Sturgeon Reserve, and upwind and downwind of the PDAs; and</i> 	Follow-up programs should be referred to the applicable monitoring and management plans and should not be standardized here.	Please replace “ <i>A follow-up program</i> ” with “ <i>The Lynn Lake Gold Project Air Quality Management and Monitoring Plan...</i> ”
32	Section 6.1.3	Recommendation	<i>If project effects are more adverse than predicted, additional mitigation measures will be developed, in consultation with Indigenous nations, Health Canada, and other relevant federal and provincial authorities, to further limit project-related increases in dustfall rates that could affect human health.</i>	If similar conditions remain, monitoring would no longer be required, or the frequency may be reduced if the predictions were confirmed.	<p>Please replace “<i>dustfall</i>” with “<i>ambient particulate matter concentrations</i>”.</p> <p>If ambient particulate matter concentration conditions remain similar, monitoring would no longer be required, if project effects are as predicted, the frequency of monitoring may be reduced.</p> <p>Please replace with “<i>If project effects are more adverse than predicted, additional mitigation measures will be developed, through engagement with local Indigenous Nations, Health Canada, and other relevant federal and provincial authorities, to further limit project-related increases in ambient particulate matter concentration rates that could affect human health.</i>”</p>

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33	Section 6.1.3	Key Issue	<i>Noise levels will be monitored at key receptor locations where human health may be affected, such as permanent or seasonal residences.</i>	As per Item 22, there are no permanent or seasonal residences within the PDA.	Please replace “permanent or seasonal residences” with “Noise levels will be monitored at key locations where human health may be affected.”
34	Section 6.1.3	Key Issue	<i>If monitoring results indicate that NO₂ and PM_{2.5} concentrations exceed CAAQS limits, additional mitigation measures will be developed to reduce NO₂ and PM_{2.5} emissions to the greatest extent possible</i>	As agreed with ECCC and HC (meeting with ECCC and HC on April 29, 2022) and as described in the response to IAAC-R2-91, a two-month ambient air quality monitoring program to measure NO ₂ concentrations will be conducted during Project operation to validate the predictions of the atmospheric dispersion model.	Please remove “NO ₂ ” and please state as follows: “If monitoring results indicate that PM _{2.5} concentrations exceed CAAQS limits, additional mitigation measures will be developed, in consultation with Health Canada, Environment and Climate Change Canada, other relevant federal and provincial authorities, and through engagement with local Indigenous Nations, to reduce PM _{2.5} emissions to the greatest extent possible.”
35	Section 6.1.3	Showstopper	All vehicles and equipment required for construction, operation, and decommissioning/closure of the Project will meet or exceed emission standards, including Tier 4 emission standards for off-road diesel equipment...	As per the comments under Item 25 above, Tier 4 equipment is expected to be used during operation, but the majority of the construction off-road equipment will be rented and could include older equipment. Therefore, the Proponent cannot ensure that all equipment and vehicles used during all phases of the Project will meet Tier 4 emission standards. If required to meet Tier 4 emission standards then some potential suppliers, including Indigenous partners, would no longer be able to supply services.	Please replace with “All vehicles and equipment required for operation of the Project will meet or exceed emission standards, including Tier 4 emission standard for off-road diesel equipment (except where this presents a barrier to local supplier/subcontractor involvement and/or Indigenous participation) ...”
36	Section 6.1.3	Key Issue	<i>...monitoring ambient air concentrations of total suspended particulate, PM₁₀, NO₂ and PM_{2.5} concentrations continuously, taking into account 24-hour and 1-hour CAAQS thresholds ...</i>	As agreed with ECCC and HC (meeting with ECCC and HC on April 29, 2022) and as described in the response to IAAC-R2-91, a two-month ambient air quality monitoring program to measure NO ₂ concentrations will be conducted during Project operation to validate the predictions of the atmospheric dispersion model. Ambient air quality monitoring of NO ₂ will not be conducted continuously during all phases of the Project. Total suspended particulate, PM ₁₀ and PM _{2.5} have only 24-hour CAAQS, no 1-hour CAAQS.	Please remove “NO ₂ ” and “1-hour CAAQS” and revise to state “...monitoring ambient air concentrations of total suspended particulate, PM ₁₀ and PM _{2.5} concentrations continuously, taking into account 24-hour CAAQS thresholds ...”
37	Section 6.1.3	Key Issue	<i>...monitoring ambient air concentrations of total suspended particulate, PM₁₀, NO₂ and PM_{2.5} concentrations continuously... on Marcel Colomb First Nation’s Black Sturgeon Reserve.</i>	As described in the response to IAAC-R2-93, the Black Sturgeon Reserve lands are located approximately 10 km southwest of the Gordon site and Monitoring Station D at the Gordon site entry gate is representative of the ambient air quality in Black Sturgeon Reserve and sensitive receptors close to Gordon site boundary, because the model predicted	Please replace “on Marcel Colomb First Nation’s Black Sturgeon Reserve” with “at the MacLellan and Gordon sites” such that this text reads: “...monitoring ambient air concentrations of total suspended particulate, PM ₁₀ and PM _{2.5} concentrations continuously, taking into

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				PM concentrations near the Gordon site boundary are greater than the predicted PM concentrations at the Black Sturgeon Reserve. Furthermore, based on the predominant wind direction from the northwest, Black Sturgeon Reserve is less frequently downwind from the Gordon site emissions than the Gordon site entry gate. Therefore, ambient air quality monitoring is proposed at the Gordon site entry gate (Station D).	<i>account 24-hour CAAQS thresholds, during construction and operation, at the MacLellan and Gordon sites."</i>
38	Section 6.1.3	Key Issue	<i>Monitoring meteorological conditions (e.g., wind speed, wind direction) upwind and downwind of the PDAs during project construction and operation.</i>	The meteorological conditions upwind and downwind of the PDA are similar and therefore, placing two meteorological stations upwind and downwind of the PDA is not warranted. Two meteorological stations at the MacLellan site and Gordon site were proposed to assist in the adaptive management of fugitive dust emissions.	Please replace with " <i>Monitoring meteorological conditions (e.g., wind speed, wind direction) at the MacLellan and Gordon sites during project construction and operation.</i> "
39	Section 6.1.3	Key Issue	<i>Dustfall rates will be monitored within Marcel Colomb First Nation's Black Sturgeon Reserve, and downwind and upwind from the PDAs during all project phases to verify model predictions of project effects to baseline dustfall rates.</i>	The baseline dustfall deposition rate was not an input to the Human Health Risk Assessment. As stated in the EIS and IAAC-R3-07, the concentrations of fine particulate matter in air (i.e., PM _{2.5}) are more appropriate for the assessment of human health effects via inhalation. Ambient air quality monitoring of TSP, PM ₁₀ and PM _{2.5} is proposed in the EIS. An Air Quality Management and Monitoring Plan is being developed which will describe the ambient air quality monitoring program for TSP, PM ₁₀ and PM _{2.5} . The results of the ambient PM monitoring will be used for the adaptive management of fugitive dust emissions. Furthermore, passive dustfall sampling has been a common practice in the past but it is no longer a recommended method because of its limitations, based on the British Columbia Ministries of Energy, Mines and Petroleum Resources and British Columbia Ministry of Environment and Climate Change Strategy's guideline "Developing a Fugitive Dust Management Plan for Industrial Projects" (2018).	Please <u>remove</u> the paragraph: " <i>Dustfall rates will be monitored within Marcel Colomb First Nation's Black Sturgeon Reserve, and downwind and upwind from the PDAs during all project phases to verify model predictions of project effects to baseline dustfall rates.</i> "
40	Section 6.1.3 Table 4	Deviation	Table 4 Estimated GHG emissions for the Gordon and MacLellan Sites	There are two errors in Table 4: 1. IAAC indicated 183 kilotonnes CO _{2e} for the Gordon site during operation. This number should have been 132 kilotonnes CO _{2e} per our response to information request IAAC-120 (Table IAAC-120-2) and Table F-12 in Appendix F Project GHG Emissions in the Air Quality Technical Modelling Report (TMR).	Please revise Table 4 as follows: 1. Table 4 GHG emissions for the Gordon site during operation should be 132 kilotonnes CO _{2e} , not 183 kilotonnes CO _{2e} . 2. Table 4 GHG emissions for the MacLellan site during operation should be 619 kilotonnes CO _{2e} , not 884 kilotonnes CO _{2e} .

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Item	Section	Rank	Excerpt	Comment	Suggestion
				<p>2. IAAC indicated 884 kilotonnes CO_{2e} for the MacLellan site during operation. This number should have been 619 kilotonnes CO_{2e} per our response to information request IAAC-120 (Table IAAC-120-2) and Table F-12 in Appendix F Project GHG Emissions in the Air Quality Technical Modelling Report (TMR).</p>	
41	Section 6.2.1	Deviation	<p><i>The Proponent predicted that concentrations of contaminants in groundwater would not exceed thresholds for the discharge of groundwater to surface water at the point of discharge, despite the predicted exceedances of federal and provincial water quality guidelines, due to dilution along the groundwater flow path". (Page 67) "The Proponent predicted that, despite the predicted exceedances of federal and provincial water quality guidelines, contaminant concentrations would not exceed groundwater quality guidelines for the protection of aquatic receptors at the point of groundwater discharge to surface waterbodies due to dilution along the groundwater flow path.</i></p>	<p>These statements in the EA report are inaccurate; the EIS did not evaluate the effect of dilution along the groundwater flow path from source seepage to the receiver. The EIS stated that the quality of source seepage from the tailings management facility (TMF) and mine rock storage area (MRSA) (i.e., quality of seepage at the point of entering the groundwater flow system) met the GW3 criteria. The GW3 is criteria for quality of groundwater that discharges to surface water that is protective of aquatic organisms. The EIS stated that the approach to the assessment of effects of the quality of groundwater from the TMF and/or MRSA that discharges to surface water was a conservative estimate as the assessment did not consider physical or chemical attenuation processes along the groundwater flow path.</p>	<p>Please revise to (Page 64) "<i>The Proponent predicted that concentrations of select contaminants in source seepage to groundwater would exceed federal and provincial water quality guidelines but would not exceed thresholds for the quality of groundwater discharging to surface water that is protective of aquatic organisms. The assessment of effects of source seepage on groundwater that discharges to surface water was a conservative estimate as the assessment did not consider physical or chemical attenuation processes along the groundwater flow path".</i></p> <p>Please also revise to (Page 65) "<i>The Proponent predicted that, despite the predicted exceedances of federal and provincial water quality guidelines, contaminant concentrations in source seepage to groundwater would not exceed groundwater quality guidelines for discharge to surface water that is protective of aquatic receptors."</i></p>
42	Section 6.2.3	Key Issue	<p><i>The Agency recommends that the Proponent implement additional mitigation measures to ensure that project-related increases in contaminant concentrations in groundwater do not exceed GCDWQ and the MWQSOG limits. The Agency recommends that the Proponent implement mitigation measures to reduce contaminant concentrations to the greatest extent possible for contaminants whose concentrations are in excess of the</i></p>	<p>There are no groundwater drinking water receptors within the PDA or LAA. The receptor of groundwater seepage is surface water. The criteria for groundwater should be criteria based on groundwater that discharges to surface water and is protective of aquatic life such as the GW3.</p>	<p>Please revise to "<i>The Agency recommends that the Proponent implement additional mitigation measures such that project-related increases in contaminant concentrations in groundwater do not exceed groundwater quality guidelines for discharge to surface water that is protective of aquatic receptors (GW3 criteria). The Agency recommends that the Proponent implement mitigation measures to reduce contaminant concentrations to the greatest extent</i></p>

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			<i>GCDWQ and the MWQSOG under baseline conditions.</i>		<i>possible for contaminants whose concentrations are in excess of groundwater quality guidelines for discharge to surface water that is protective of aquatic receptors under baseline conditions."</i>
43	Section 6.2.3	Deviation/Key Issue	<i>Contact water, effluent, and seepage, including groundwater that flows into the open pits, will be collected and managed before it is discharged into the receiving environment during all phases. Contact water will be treated to meet the GCDWQ and the MWQSOG requirements prior to discharge, as necessary.</i>	<p>Contact water and seepage from mine sites is regulated under the Metal and Diamond Mining Effluent Regulation.</p> <p>This statement requires all seepage from the TMF and MRSAs to be collected during all phases of the Project regardless of if the quality of that seepage is not discernable from background groundwater quality. The statement would require lining of the TMF and MRSAs regardless of the quality of seepage and indefinite collection of seepage through closure as the TMF and MRSA will remain in a closed state indefinitely.</p>	<p>Please revise to "Contact water, effluent, and seepage, including groundwater that flows into the open pits, will be collected during operation, and managed before it is discharged into the receiving environment, as necessary, in accordance with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act.</p> <p>Contact water, effluent, and seepage, including groundwater that flows into the open pits, will be collected after operation as necessary to comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act."</p>
44	Section 6.2.3	Deviation	<i>Project-related contaminant inputs into groundwater, including from the Tailings Management Facility, mine rock storage areas, and overburden and ore stockpiles, will not result in exceedances of GCDWQ and the MWQSOG limits. For contaminants whose concentrations are in excess of the GCDWQ and the MWQSOG in groundwater reserves under baseline conditions, the Proponent will reduce project-related contaminant inputs to groundwater to the greatest extent possible.</i>	<p>This statement is incorrect. The quality of seepage from the TMF and MRSA was predicted to exceed the GCDWQ and/or the MWQSOG limits for select parameters but be less than the GW3, which is criteria for groundwater that discharges to surface water that is protective of aquatic life. The predicted quality of groundwater seepage discharging to surface water receivers was deemed not significant effect on surface water quality of the receivers.</p>	<p>Please revise to "Project-related contaminant inputs into groundwater, including from the Tailings Management Facility, mine rock storage areas, and overburden and ore stockpiles, will not result in exceedances of groundwater quality guidelines for discharge to surface water that is protective of aquatic receptors. For contaminants whose concentrations are in excess of groundwater quality guidelines for discharge to surface water that is protective of aquatic receptors in groundwater reserves under baseline conditions, the Proponent will reduce project-related contaminant inputs to groundwater to the greatest extent possible."</p>

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Item	Section	Rank	Excerpt	Comment	Suggestion
45	Section 6.3.2	Showstopper	<i>Natural Resources Canada recommended that the Proponent be required to confirm that all construction materials, including any used for grading and earthworks, are not acid generating, potentially acid generating, or metal leaching substances. Natural Resources Canada also recommended that the Proponent carry out sequential mining of the open pits and backfill the open pits with mine rock as opposed to stockpiling to limit potential effects to surface water.</i>	<p>Construction materials are considered potentially acid generating (PAG) if sulphur content is above 0.11% and NPR is below 2. Only non-PAG mine rock, including that produced from the open pits, will be used for construction of pads, roads, and building foundations above the water table. Overburden and ex-pit rock identified as PAG will be excluded from construction and transported to the MRSA unless PAG materials are covered with water or materials reducing infiltration and oxygen ingress.</p> <p>Sequential mining and backfilling pits with mine rock is not technically or economically feasible.</p>	<p>Understanding that this is a summary of what Natural Resources Canada has said, no suggestions are provided, however, please see Item 46.</p>
46	Section 6.3.3	Showstopper	<i>The Agency recommends that the Proponent use construction materials that are not acid generating, potentially acid generating, or metal leaching; test mine rock prior to construction and throughout operation to identify potentially acid generating material requiring management; continuously monitor areas where potentially acid generating rock is to be stored for signs of acid rock drainage and metal leaching; and implement mitigation measures to prevent adverse effects to surface water quality if acid rock drainage or metal leaching are detected, including seepage and runoff collection and treatment.</i>	<p>See comment under Item 45 re: use of construction materials.</p> <p>ARD/ML potential of mine rock will be monitored according to the Acid Rock Drainage/Metal Leaching (ARD/ML) Management and Monitoring Plan being developed.</p>	<p>Please revise to “<i>The Agency recommends that the Proponent use construction materials that are not acid-generating, <u>non</u>-potentially acid-generating or metal leaching unless water and oxygen infiltration and ingress are precluded; test mine rock prior to construction and throughout operation to identify potentially acid generating material requiring management; continuously monitor areas where potentially acid generating rock is to be stored for signs of acid rock drainage and metal leaching; and implement mitigation measures to prevent adverse effects to surface water quality if acid rock drainage or metal leaching are detected, including seepage and runoff collection and treatment.</i>”</p>
47	Section 6.3.3	Showstopper	<i>...materials that are acid generating, potentially acid generating, or metal leaching will not be used during construction, including for grading and earthworks.</i>	<p>See comment Item 45 re: use of construction materials.</p>	<p>Please revise to “<i>...the Proponent use construction materials that are not acid-generating, <u>non</u>-potentially acid-generating or metal leaching during construction, including for earthworks and grading unless water and oxygen infiltration and ingress are precluded.</i>”</p>

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Item	Section	Rank	Excerpt	Comment	Suggestion
48	Section 6.3.3	Key Issue	<p><i>...monitoring locations for Gordon Lake, Farley Lake, Minton Lake, Cockeram Lake, Swede Lake, Ellystan Lake, Arbor Lake, Burger Lake, the Keewatin River, the unnamed tributary of the Keewatin River, the Hughes River, the pit lakes, and the Tailings Management Facility;</i></p>	<p>This list of monitoring locations is incorrect (and there is no such location as “Burger Lake”; it is “Burge Lake”).</p> <p>The TMF pond will be monitored per the ARD/ML Management and Monitoring Plan. The ARD/ML Management and Monitoring Plan will be reviewed by local Indigenous Nations, and relevant federal and provincial authorities and updated. This plan discusses:</p> <ul style="list-style-type: none"> • follow up programs, testing, identification and monitoring of mine rock, prior to construction and during operation, • adaptive management of potentially acid generating rock, including for the mine rock storage areas, ore stockpiles, and the Tailings Management Facility. <p>Discharges to the downstream receiving environment will be monitored per the Surface Water Management and Monitoring Plan (SWMMP). The location and extent of mixing zones and surface water quality at and downstream of the edge of mixing zones will be presented in the Surface Water Management and Monitoring Plan. The final selection of monitoring locations included in the SWMMP will be finalized through engagement with local Indigenous Nations and consultation with relevant federal and provincial authorities prior to construction.</p> <p>Having explicit monitoring locations and parameters as listed here undermines the planned engagement process with local Indigenous Nations and planned consultation with relevant federal and provincial authorities prior to construction.</p>	<p>Please revise to “...<i>monitoring locations, including near-field, far-field, and reference locations that will be included in the Surface Water Management and Monitoring Plan, that will be selected through engagement with local Indigenous Nations and in consultation with relevant federal and provincial authorities and the collection ponds and tailings management facility pond that will be included in the ARD/ML Management and Monitoring Plan.</i>”</p>
49	Section 6.3.3	Key Issue	<p><i>Prior to construction, a follow-up program will be developed, in consultation with Indigenous nations and relevant federal and provincial authorities, to monitor methyl-mercury concentrations in both environmental (e.g., surface water) and fish tissue samples throughout the life of the Project and to mitigate and manage any detected methyl-mercury spikes.</i></p>	<p>In its response to IAAC-R2-17, Alamos provided a scientific rationale for why it does not consider monitoring methylmercury concentrations in surface water and fish tissues warranted until total mercury concentrations in any mine effluent exceeds 0.1 µg/L as required in Schedule 5 of the Metal and Diamond Mine Effluent Regulation. The Proponent intends to include monitoring of total mercury in surface water in the Surface Water Management and Monitoring Plan and total mercury in fish tissues in the Aquatic Effects Monitoring Plan.</p>	<p>Please revise to “<i>Prior to discharge of mine effluent, an Environmental Effects Monitoring (EEM) Plan, consistent with Schedule 5 of the Metal and Diamond Mine Effluent Regulation (MDMER) will be developed, through engagement with local Indigenous Nations and in consultation with relevant federal and provincial authorities. At a minimum, this EEM Plan will include effluent and water quality monitoring studies but will also include biological monitoring studies (i.e., fish tissues, benthic</i></p>

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					<i>invertebrate community) if required under Schedule 5 of the MDMER.”</i>
50	Section 6.4.3	Deviation/Key Issue	<i>A 30-metre buffer will be established around wetlands prior to work in these areas to limit disturbance, maintain existing vegetation, and promote recovery of vegetation. When work near wetlands is required, existing access routes and weight-distributing materials under machinery will be used to limit soil compaction.</i>	Wetlands within the PDA cannot be avoided.	Please replace with “A 30-metre buffer will be established around wetlands adjacent to the PDA prior to work to limit disturbance and maintain existing vegetation. When work near wetlands adjacent to the PDA is required, existing access routes will be planned to maintain a 30-metre buffer and weight-distributing materials will be used under machinery to limit soil compaction in areas where excavation is not planned.”

Section 7 – Predicted Effects on Valued Components

Item	Section	Rank	Excerpt	Comment	Suggestion
51	Section 7.1	Recommendation	<i>The Project could cause residual effects to fish and fish habitat, as defined in the Fisheries Act, and fish species at risk designated by COSEWIC, through habitat loss or alteration, changes in water levels and streamflows, and effects to fish health, growth, and survival.</i>	The Western Hudson Bay populations of lake sturgeon (which includes the Churchill River) are designated as “endangered” by COSEWIC but are not currently on Schedule 1 of the <i>Species at Risk Act</i> ; they are currently “under consideration for addition” by the Government of Canada.	Please revise to: “ <i>The Project could cause residual effects to fish and fish habitat, as defined in the Fisheries Act, and fish species at risk designated by COSEWIC (but none currently listed on Schedule 1 of the Species at Risk Act), through ...</i> ”
52	Section 7.1.1	Deviation	<i>For the purpose of the environmental assessment, the Proponent selected the following focal fish species, as they were identified within the LAAs during baseline studies and their life history and habitat requirements were considered representative of fish species present within the PDAs, LAAs, and RAA: northern pike, lake whitefish, and a group of forage fish species, including brook stickleback.</i>	This is inaccurate. Walleye was included as a focal fish species in the Environmental Impact Assessment but was not included in the fish species listed in this paragraph. In addition, potential effects to lake sturgeon and burbot were assessed during Round 2 Information Requests (see IAAC-R2-39).	Please revise to “ <i>For the purpose of the environmental assessment, the Proponent selected the following focal fish species, as they were identified within the LAAs during baseline studies and their life history and habitat requirements were considered representative of fish species present within the PDAs, LAAs, and RAA: northern pike, lake whitefish, walleye, and a group of forage fish species, including brook stickleback. Additionally, potential effects to lake sturgeon and burbot were assessed during the EIS review.</i> ”
53	Section 7.1.1	Recommendation	<i>Dewatering of the East and Wendy pit lakes (i.e., Gordon site); ... to extract fresh water and discharge treated contact water could result in the harmful</i>	The EIS and Information Request responses submitted during the Technical Review phase do not state that contact water will be “treated” prior to release to the downstream receiving environment. Water in the two	Please revise to “ <i>...to extract fresh water and discharge contact water could result in the harmful alteration,</i>

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			<i>alteration, disruption, or destruction of fish habitat.</i>	existing open pits will be aerated prior to dewatering but should not be considered in the context of "treatment" in a water treatment plant.	<i>disruption, or destruction of fish habitat."</i>
54	Section 7.1.1 Table 11	Recommendation	<i>Table 11 Fish Species Present in Waterbodies Potentially Affected by the Project</i>	Table 11 indicates that white suckers are present in Gordon Lake. The table should have a footnote that indicates that white suckers "may be present only during the open-water season because Gordon Lake is anoxic in winter and, therefore, does not provide overwintering conditions in which white suckers can survive."	Please add a footnote to Table 11 that indicates that "White suckers may be present only during the open-water season; Gordon Lake is anoxic in winter and does not provide overwintering conditions suitable for white sucker survival."
55	Section 7.1.1 Table 12	Deviation	<i>Table 12 Direct and Indirect Fish Habitat Losses within the Gordon and MacLellan site PDAs and LAAs</i>	Table 12 correctly states the amount of fish-bearing wetlands that were predicted in the response to IAAC-R2-80. However, since this submission, Alamos has completed additional ground-truthing of potentially fish-bearing shrubby and treed wetlands within and downstream of the predicted zone of groundwater table draw-down at both sites. These surveys have confirmed a total of 104,570 m ² of fish-bearing wetlands at the Gordon site (40,530 m ² less than reported in the response to IAAC-R2-80) and a total of 165,080 m ² of fish-bearing wetlands at the MacLellan site (25,700 m ² more than reported in the response to IAAC-R2-80).	The spatial area of fish-bearing wetlands directly or indirectly lost at the Gordon and MacLellan sites in Table 12 should be revised to 104,570 m ² and 165,080 m ² , respectively.
56	Section 7.1.1	Recommendation	<i>Project-related changes in lake levels, streamflows, and groundwater levels at the Gordon and MacLellan sites would result in indirect fish habitat losses in East pond, its outlet, and fish-bearing wetlands within the PDAs and LAAs.</i>	East Pond is at the MacLellan Site not the Gordon Site.	Please revise to: "Project-related changes in lake levels, streamflows, and groundwater levels at the MacLellan site would result in indirect fish habitat losses in East Pond, its outlet, and fish-bearing wetlands within the PDA and LAA (Table 12)."
57	Section 7.1.1	Recommendation	<i>For Gordon Lake, although project-related water level changes would occur during all phases, the area of shoreline fish habitat was predicted to remain unchanged and effects to dissolved oxygen concentrations during winter were not predicted to measurably affect the ability of fish to overwinter relative to baseline. Effects to dissolved oxygen concentrations during the summer months were not predicted.</i>	The last sentence of first paragraph (page 92) could be interpreted as dissolved oxygen concentrations during the summer months were not considered. This is not correct. Suggest re-wording to rectify this potential misinterpretation.	Please revise to "Effects to dissolved oxygen concentrations during the summer months were not predicted to occur."
58	Section 7.1.1	Recommendation	<i>Project activities were not predicted to affect dissolved oxygen concentrations in Farley Lake in any season or phase;</i>	Similar to Item 59, there is room for misinterpretation as written.	Please revise to "Project activities were not predicted to affect dissolved oxygen concentrations in Farley Lake in any

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			<i>therefore, effects to the ability of fish species in Farley Lake to overwinter were not predicted.</i>		<i>season or phase; therefore, effects on the ability of fish species in Farley Lake to overwinter were not predicted to occur."</i>
59	Section 7.1.1	Key Issue	<i>The Proponent did not predict that project activities at the Gordon and MacLellan sites would result in adverse effects to fish migration or local movements and any project-related mercury methylation that may occur would not affect fish health.</i>	This sentence is potentially misleading because the Proponent did not predict that the Project would be a source of methylmercury. See response to IAAC-R2-17 for the rationale.	Please revise to: <i>"The Proponent did not predict that project activities at the Gordon and MacLellan sites would result in adverse effects to fish migration or local movements, and project-related increases in mercury methylation that could adversely affect fish health were not predicted to occur."</i>
60	Section 7.1.1	Recommendation	<i>One fish species at risk, lake sturgeon, listed as "Endangered" by COSEWIC, is present in the Hughes River and Keewatin River.</i>	As noted under Item 51, the Western Hudson Bay populations of lake sturgeon (which includes the Churchill River) are designated as "endangered" by COSEWIC but are not currently on Schedule 1 of the <i>Species at Risk Act</i> ; they are currently "under consideration for addition" by the Government of Canada.	Please revise to: <i>"One fish species at risk, lake sturgeon, listed as "endangered" by COSEWIC but not currently listed as "endangered" on Schedule 1 of the Species at Risk Act, is present in the Hughes River and Keewatin River."</i>
61	Section 7.1.1	Deviation/Key Issue	<i>The Proponent was of the view that the life history and habitat requirements of lake sturgeon, which was not selected as a focal species for the assessment of effects to fish and fish habitat, were represented by the focal fish species selected.</i>	This statement is misleading as the Proponent did a <u>complete</u> assessment of potential effects on lake sturgeon in the response to IAAC-R2-39. The reason the Proponent did not include lake sturgeon as a focal species in the EIS was because it was assumed no effect would occur in the Hughes River or Keewatin River (the only places lake sturgeon are reportedly present in the LAAs and RAA).	Please revise to: <i>"The Proponent was of the view that the life history and habitat requirements of lake sturgeon, which was not originally selected as a focal species for the assessment of effects to fish and fish habitat, were represented by the focal fish species selected. However, the Proponent did assess potential effects to lake sturgeon in the Keewatin River and Hughes River in a response to an Information Request from federal regulators and engaged Indigenous Nations."</i>
62	Section 7.1.1	Deviation	<i>Adverse effects to lake sturgeon at the Gordon site were not predicted as effects to the Hughes River were considered unlikely, given its distance (i.e., approximately six kilometres) downstream of the Gordon site PDA relative to the predicted extent of project effects.</i>	The Hughes River is at least 9 km downstream of the Gordon Site.	Please revise to <i>"...given its distance (i.e., approximately 9 km) downstream..."</i>
63	Section 7.1.2	Key Issue	<i>To address this uncertainty, Fisheries and Oceans Canada recommended that the Proponent undertake additional</i>	The Proponent completed additional surveys to confirm the spatial extent of fish-bearing wetlands potentially affected by mine infrastructure and groundwater table	Please revise to include an additional sentence such that this section reads as follows: <i>"The Proponent completed</i>

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			<i>fisheries inventories for a subset of the shrubby and treed wetlands at the Gordon and MacLellan sites prior to construction to inform fish habitat offsetting requirements.</i>	draw-down in summer 2022. The results of these surveys are provided in the changes proposed to Table 12 (see Item 55).	<i>field surveys in spring and summer 2022 to address this uncertainty and results of these surveys are shown in the spatial areas of “partial or complete dewatering of fish-bearing wetlands” at the Gordon and MacLellan sites in Table 12.”</i>
64	Section 7.1.2	Showstopper	<i>It was also recommended that the Proponent limit blasting during fish spawning periods to mitigate percussive injuries to fish, given the proximity of proposed blasting sites to fish-bearing waterbodies. Consideration must also be given to provincial fisheries management objectives in determining appropriate measures to mitigate harmful alteration, disruption, or destruction of fish habitat.</i>	<p>Limiting blasting during fish spawning period is not a feasible mitigation measure for the LLGP. This is because there are spring, summer, fall, and winter spawning fish species present in lakes and streams near the Gordon and MacLellan sites and, therefore, there would be no reduced risk window in which blasting could occur at any point in the year.</p> <p>The Proponent is unaware of any provincial fisheries management objective that would assist in determining appropriate measures to mitigate harmful alteration, disruption, or destruction of fish habitat. However, Alamos discussed the Project and fish habitat offsetting with Don MacDonald (Manitoba Fisheries Branch) prior to his retirement.</p> <p>The Proponent is following DFO’s preference hierarchy of avoidance, mitigation, and offsetting as a last resort to manage potential effects to fish habitat. Alamos assumes that any provincial management objectives would be consistent with this federal direction.</p>	Please revise to “It was also recommended that the Proponent limit blasting during fish spawning periods, to the extent possible, and incorporate best management practices to mitigate percussive injuries to fish, given the proximity of proposed blasting sites to fish-bearing waterbodies. Consideration should be given to provincial fisheries management objectives and/or consultation with Manitoba Fisheries Branch when determining appropriate measures to mitigate or offset harmful alteration, disruption, or destruction of fish habitat, while also considering DFO’s Fish and Fish Habitat Protection Policy.”
65	Section 7.1.2	Key Issue	<i>Fisheries and Oceans Canada expressed concerns regarding the Proponent’s commitment to establish a water withdrawal limit for the Project of less than 10% of instantaneous stream discharge to maintain ecological flow requirements. As the 10% threshold established in Fisheries and Oceans Canada’s Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada (2013) refers to a cumulative change in instantaneous discharge, applying this threshold on a project-specific basis may not guarantee that ecological flow requirements are maintained.</i>	It is incorrectly stated that the Proponent committed to establish a water withdrawal limit for the Project of <10% of instantaneous stream discharge (in the Keewatin River) to maintain ecological flow requirements. Rather, the Proponent stated that water withdrawals from the Keewatin River would be <2% of mean monthly flows and only referred to DFO’s Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada (DFO 2013), which identifies this 10% threshold, as a point of reference to support the contention that the proposed water withdrawal volumes are low and will not affect fish. There are no other existing or reasonably foreseeable water users of the Keewatin River that would result in cumulative flow reductions >10%.	Please revise to “Fisheries and Oceans Canada expressed concerns regarding the Proponent’s application of the 10% threshold established in Fisheries and Oceans Canada’s Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada.”

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66	Section 7.1.2	Key Issue	<i>Environment and Climate Change Canada also expressed concerns with respect to the predicted exceedances of the CWQG-FAL limits for arsenic in the unnamed tributary of the Keewatin River and the Proponent's rationale that effects to fish and fish habitat would not occur despite these exceedances. As the CWQGFAL limit takes into consideration arsenic levels that may result in long-term/chronic effects to fish, the Proponent must evaluate further options to reduce arsenic concentrations in the receiving environment.</i>	This statement does not recognize that the arsenic concentrations are never predicted to exceed the Manitoba arsenic guideline, that the CWQG includes a 10X safety factor, and that the predicted exceedance is not expected to occur until post-closure when the open pit is full and discharging to the receiving environment.	Please revise the second sentence to: <i>"The CWQG-FAL limit takes into consideration arsenic levels that may result in long-term/chronic effects to fish and aquatic biota but includes a 10x safety factor due to uncertainty in the available toxicity information. Therefore, the Proponent should evaluate options to reduce arsenic concentrations in the receiving environment prior to mine closure."</i>
67	Section 7.1.2	Key Issue	<i>Fisheries and Oceans Canada also expressed concerns regarding the lack of Proponent engagement with Indigenous nations and provincial fisheries managers regarding proposed fish habitat offset measures.</i>	This statement is misleading. The Proponent has engaged with members of the Marcel Colomb First Nation, including Elders and the Chief and Council about fish habitat offsetting. The Proponent has also sent information and requests for input to other potentially affected Indigenous Nations. Additionally, the Proponent discussed fish habitat offsetting with Don MacDonald, Regional Manager, Manitoba Fisheries Branch, before he retired in 2019.	Please revise to: <i>"Fisheries and Oceans Canada also expressed concern regarding the level of Proponent engagement with Indigenous Nations and provincial fisheries managers regarding proposed fish habitat offset measures."</i>
68	Section 7.1.2	Key Issue	<i>Fisheries and Oceans Canada advised that lake sturgeon do not have similar life history and habitat requirements to the focal fish species selected for the assessment of effects to fish and fish habitat and therefore the Proponent's assessment may not accurately reflect potential effects to lake sturgeon. However, Fisheries and Oceans Canada indicated that they are satisfied that the Proponent's proposed fish habitat offsetting would adequately address potential effects to lake sturgeon.</i>	The Proponent provided an assessment of potential effects on lake sturgeon in its response to IAAC-R2-39.	Please revise to <i>"...the Proponent's assessment may not accurately reflect potential effects to lake sturgeon. In response to this concern, the Proponent provided an assessment of the potential effects of the Project on lake sturgeon in the Keewatin River and the Hughes River. Fisheries and Oceans Canada indicated that they are satisfied...."</i>
69	Section 7.1.2	Key Issue	<i>Mathias Colomb Cree Nation expressed concerns that the focal fish species selected for the assessment of effects to fish and fish habitat may not be reflective of the unique life history, ecology, and habitat requirements of culturally important fish species,</i>	The Proponent provided an assessment of potential effects on lake sturgeon in its response to IAAC-R2-39.	The Proponent's assessment of potential effects on lake sturgeon should be acknowledged in the EA report – see Item 68.

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			<i>including lake sturgeon and burbot. Therefore, potential project effects to these species may have been underestimated and improperly or inadequately mitigated. Peter Ballantyne Cree Nation highlighted the need for the Proponent to develop mitigation measures specific to species of cultural importance to Indigenous nations, including lake sturgeon.</i>		
70	Section 7.1.3	Key Issue	<i>The Agency understands that the Proponent committed to collecting additional field data regarding the fish-bearing status of wetlands within the Gordon and MacLellan site PDAs and LAAs, prior to submission of an application for a Fisheries Act authorization, to verify the spatial extent of fish-bearing wetlands that may be directly or indirectly affected by the Project.</i>	The Proponent completed additional surveys to delineate the spatial extent of fish-bearing wetlands potentially affected by the PDA and predicted groundwater table draw-down at the Gordon site and MacLellan site in spring and summer 2022. Results of these surveys are provided in the response to Item 55.	Please revise to “ <i>The Agency understands that the Proponent collected additional field regarding the fish-bearing status of wetlands within the Gordon and MacLellan site PDAs and LAAs and that these data will be used to update the spatial extent of fish-bearing wetlands that may be directly or indirectly affected by the Project for the submission of an application for a Fisheries Act authorization.</i> ”
71	Section 7.1.3	Key Issue	<i>The Agency agrees with Environment and Climate Change Canada’s recommendation that the Proponent be required to collect baseline surface water quality data for fish-bearing wetlands that may be affected by the Project to inform follow-up and monitoring activities.</i>	The Proponent provided rationale as to why monitoring water quality in fish-bearing wetlands was not warranted in the response to IAAC-R2-80. This issue was deemed resolved.	Please revise to: “ <i>While Environment and Climate Change Canada recommended that the Proponent be required to collect baseline surface water quality data for fish-bearing wetlands that may be affected by the Project to inform follow-up and monitoring activities, Alamos provided sufficient rationale as to why such data collection is not warranted; therefore, the Agency is not recommending water quality monitoring in fish-bearing wetlands.</i> ”
72	Section 7.1.3	Key Issue	<i>The Agency agrees with Fisheries and Oceans Canada’s recommendation that the Proponent collect data prior to construction to characterize the amount and quality of fish habitat present and fish habitat utilization in Farley Creek, and conduct a comprehensive flow and fish and fish habitat monitoring program for Farley Creek to verify the results of the hydraulic model.</i>	A flow and fish habitat monitoring program for Farley Creek is included in the Aquatic Effects Monitoring Plan. However, characterizing the utilization of Farley Creek by fish is not feasible due to safety issues and the ineffectiveness of various gear types and water conditions to capture fish. The Proponent has proposed that monitoring be based on flow and habitat metrics instead of fish utilization for these reasons. This was discussed with Fisheries and Oceans Canada at a meeting on April 19, 2022 and deemed reasonable.	Please revise to “ <i>The Agency agrees with Fisheries and Oceans Canada’s recommendation...to verify the results of the hydraulic model. However, given safety concerns and the ineffectiveness of various gear types and water conditions required to capture fish, the monitoring program for Farley Creek should be based on flow and habitat metrics rather than fish utilization.</i> ”

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73	Section 7.1.3	Showstopper	<i>The Agency agrees with Manitoba Environment, Climate, and Parks and Mathias Colomb Cree Nation that the use of explosives during operation at the Gordon and MacLellan sites may result in fish mortality or injury and damage to fish eggs and agrees that blasting during restricted activity periods and fish spawning periods must be avoided to limit percussive injuries to fish and damage to fish eggs.</i>	<p>Limiting blasting during fish spawning period is not a feasible mitigation measure for the LLGP. This is because there are spring, summer, fall, and winter spawning fish species present in lakes and streams near the Gordon and MacLellan sites and, therefore, there would be no reduced risk window in which blasting could occur at any point in the year.</p> <p>However, Alamos is committed to limiting potential effects to fish from blasting and is currently looking at a variety of mitigation methods to reduce mortalities and injuries to fish in the lakes and streams near the open pits. These include but are not limited to optimizing the blast design to reduce sound pressures and peak particle velocities; fish exclusion areas; bubble curtains.</p>	<i>Please revise to “The Agency agrees with Manitoba Environment, Climate, and Parks and Mathias Colomb Cree Nation that the use of explosives during operation at the Gordon and MacLellan sites may result in fish mortality or injury and damage to fish eggs. However, given the proximity of the proposed open pits to fish-bearing lakes and streams, the Agency recommends that the Proponent limit blasting during fish spawning periods, to the extent possible, and incorporate best management practices to mitigate percussive injuries to fish during mine operations.”</i>
74	Section 7.1.3	Deviation/Key Issue	<i>Groundwater collected by interceptor wells and water from the existing Wendy and East pit lakes, prior to dewatering, will be aerated to encourage precipitation of oxide-forming elements...</i>	<p>This is not correct. Aeration in relation to the interceptor wells was not a commitment made by the Proponent in the EIS or Information Request responses as it would not allow the LLGP to discharge directly. In addition, aeration would be required in the settling points, which would/could be contradictory to the purpose of a settling pond and decreasing turbidity.</p> <p>The need to aerate groundwater is based on current modelling results, which indicate potential exceedances of water quality guidelines in the mixing zones of Gordon and Farley lakes for fluoride, iron, and manganese. In addition, current modelling does not account for the potential accumulation of groundwater and site contact water in Gordon and Farley lakes, owing to their relatively small water volumes and inflow volumes (i.e., limited assimilative capacity). Aeration is a method to create precipitates of those metals known to form oxides with air (e.g., iron oxide, manganese oxide). However, doing so may also require the use of flocculants and/or geomembrane bags to filter out the precipitates if the retention time in the ponds is insufficient to cause the precipitates to fall out of suspension naturally.</p>	<i>Please revise to “Groundwater collected by interceptor wells and water from the existing Wendy and East pit lakes, prior to dewatering as necessary to meet water quality guidelines for the protection of aquatic life, will be aerated to increase dissolved oxygen (DO) concentration and encourage (co)precipitation of oxide forming elements.”</i>
75	Section 7.1.3	Key Issue	<i>The Agency agrees with Fisheries and Oceans Canada that the 10% instantaneous discharge water withdrawal limit proposed by the Proponent may not ensure that</i>	The Proponent did not propose that the 10% instantaneous discharge water withdrawal limit would ensure that minimum ecological flow requirements in the Keewatin River. The Proponent introduced the 10% instantaneous threshold in the EIS as a tool to support	<i>Please revise to “The Agency agrees with Fisheries and Oceans Canada that the 10% instantaneous discharge water withdrawal limit may not ensure that minimum ecological flow requirements</i>

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			<i>minimum ecological flow requirements in watercourses are maintained and agrees that the Proponent must apply this threshold in consideration of cumulative changes in instantaneous discharge to ensure protection of fish and fish habitat.</i>	the contention that mean monthly flows predictions of <2% in the Keewatin River (i.e., <2%) were unlikely to result in adverse effect fish in the river. Alamos understands that the 10% instantaneous threshold is not directly comparable to monthly flow predictions. Alamos also understands that the 10% threshold is based on cumulative changes in instantaneous discharge. However, there are no other existing or reasonably foreseeable water users that would result in cumulative flow reductions >10% in the Keewatin River upstream or downstream of the Project.	<i>in the Keewatin River are maintained. The Agency agrees that the Proponent must apply this threshold when withdrawing water from the Keewatin River during mine construction and operations in consideration of cumulative changes in instantaneous discharge to protect fish and fish habitat in the Keewatin River.”</i>
76	Section 7.1.3	Key Issue	<i>To support this monitoring, collection of additional data regarding plankton, periphyton, and benthic invertebrates prior to construction is required to enable detection of project-related changes to the aquatic environment.</i>	Plankton and periphyton communities are highly variable in space and time and using them as a monitoring tool to detect potential change caused by the Project is likely to be statistically unrealistic. Alamos is committed to monitoring chlorophyll a concentration in periphyton and plankton communities but not community structure metrics (e.g., evenness, taxa richness, diversity indices) for these reasons.	Please revise to “ <i>To support this monitoring, the Proponent will collect data regarding chlorophyll a concentration in periphyton communities in streams and plankton communities in lakes and will monitor benthic invertebrates in streams and lakes prior to construction to enable detection of project-related changes to the aquatic environment.</i> ”
77	Section 7.1.3	Key Issue	<i>The Agency acknowledges that the Proponent’s assessment may not have specifically considered potential project effects to all fish species of cultural importance to Indigenous nations or that may be more sensitive to project effects than the focal fish species selected, which may affect the certainty of conclusions regarding potential effects to these species. The Agency recommends that the Proponent include species of cultural importance to Indigenous nations and sensitive fish species in follow-up and monitoring programs to verify the results of the environmental assessment, verify the effectiveness of mitigation measures, and inform the need for contingency measures. The Agency also recommends that Indigenous nations be engaged regarding the fish species assemblage to be monitored.</i>	The Proponent assessed potential effects of the Project on lake sturgeon and burbot, two species identified by local Indigenous Nations as culturally important, in its response to IAAC-R2-39. Alamos is committed to including a lake sturgeon research and assessment program in the Keewatin River and Hughes River as a complementary measure in the fish habitat offsetting plan that will be submitted to DFO as part of the Project’s Fisheries Act Authorization application. However, Alamos does not agree that including follow-up and monitoring activities specifically for lake sturgeon is warranted or logistically realistic. Lake sturgeon are only found in the Keewatin River and Hughes River within the RAA. They are large, long-lived fish and, given that the COSEWIC status of the Western Hudson Bay population is “endangered”, the capture of lake sturgeon in sufficient numbers for a statistically based monitoring program is unlikely. Alamos agrees that monitoring of fish tissue metal concentrations in fish species downstream of the Gordon and Maclellan sites should be part of the follow-up and monitoring program and has included fish tissue sampling in the AEMP it has developed for the Project. However, Alamos does not agree that monitoring fish population abundance, habitat use, or	Please revise to “ <i>The Agency acknowledges that the Proponent’s assessment did not specifically consider potential project effects to all fish species of cultural importance to local Indigenous Nations or that may be more sensitive to project effects than the focal fish species selected. However, the Agency acknowledges that the Proponent did assessment potential project effects to lake sturgeon and burbot, two fish species identified as culturally important to local Indigenous Nations, during the Information Request period. The Agency recommends that the Proponent engage with local Indigenous Nations regarding the fish species assemblage to be monitored to verify the results of the environmental assessment and the responses to Information Requests, to verify the effectiveness of mitigation measures, including those specific to fish species of cultural importance to local</i>

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				<p>fish community composition should be part of the follow-up and monitoring program. This is because of the high natural variability of fish populations and the need for long-term data sets (e.g., >10 years) to detect significant change. Instead, Alamos intends to monitor fish habitat metrics, metrics that are more likely to elicit statistically significant differences within the time frame of the Project.</p>	<p><i>Indigenous Nations, and to inform the need for contingency measures.”</i></p>
78	Section 7.1.3	Key Issue	<p><i>The Agency acknowledges that the Project may affect lake sturgeon and its habitat and that uncertainty exists regarding the abundance and distribution of lake sturgeon habitat and populations within the Gordon and MacLellan site PDAs and LAAs, which may affect the certainty of conclusions with respect to project effects. The Agency understands that the Proponent committed to conducting or supporting research related to the spawning success, juvenile recruitment, and genetic composition of lake sturgeon populations in the Hughes River and Keewatin River, and that Indigenous nations will be engaged regarding the development and implementation of this research program.</i></p>	<p>The Proponent does not agree that there is uncertainty about the presence of lake sturgeon habitat or lake sturgeon within the Gordon and MacLellan site PDAs or LAAs. Lake sturgeon reside in large rivers such as the Keewatin River and Hughes River. They do not inhabit small headwater lakes and streams such as those within the Gordon LAA or the MacLellan LAA (excluding the Keewatin River). This is because the lakes and streams within the Gordon and MacLellan PDAs and LAAs (excluding the Keewatin River) are not deep enough or fast enough to provide the spawning, rearing, or overwintering habitat used by lake sturgeon.</p>	<p>Please revise to “<i>The Agency acknowledges that the Project may affect lake sturgeon and its habitat in the Keewatin River and Hughes River. The Agency understands that the Proponent has committed to conducting or supporting research related to the spawning success, juvenile recruitment, and genetic composition of lake sturgeon populations in the Keewatin River and Hughes River as part of the fish habitat offset plan for the application for a Fisheries Act authorization and that local Indigenous Nations will be engaged regarding the development and implementation of this research program.</i>”</p>
79	Section 7.1.3	Key Issue	<p><i>The Agency recommends that the Proponent include lake sturgeon, particularly the Keewatin River and Hughes River populations, as a focal species in follow-up and monitoring programs for the Project to verify the results of the environmental assessment, verify the effectiveness of mitigation measures, and inform the need for contingency measures, and consider the results of the lake sturgeon research and monitoring program in the development and implementation of follow-up and monitoring programs. The Agency is of the view that offsetting under a Fisheries Act authorization will ensure that residual effects of the Project to lake sturgeon habitat are</i></p>	<p>Alamos does not agree that including follow-up and monitoring activities specifically for lake sturgeon is warranted or logistically realistic. Lake sturgeon are only found in the Keewatin River and Hughes River within the RAA. They are large, long-lived fish and, given that the COSEWIC status of the Western Hudson Bay population is “endangered”, the capture of lake sturgeon in sufficient numbers for a statistically based monitoring program is unlikely. The only portion of the AEMP that could realistically include lake sturgeon is sampling of fish tissues for potential changes in metal concentrations. However, doing so would require the intentional capture of lake sturgeon in both rivers and the collection of non-lethal tissue “plugs” from each fish captured. While possible, the number of fish captured during any survey would likely be low and unreliable and there would be a potential for mortality of fish</p>	<p>Please revise to “<i>The Agency recommends that the Proponent engage with local Indigenous Nations regarding the fish species assemblage to be monitored to verify the results of the environmental assessment and the responses to Information Requests, to verify the effectiveness of mitigation measures, including those specific to fish species of cultural importance to local Indigenous Nations, and to inform the need for contingency measures. The Agency is of the view that offsetting under a Fisheries Act authorization will ensure that residual effects of the Project to lake sturgeon habitat are counterbalanced through positive contributions.</i>”</p>

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			<i>counterbalanced through positive contributions.</i>	unable to recover from the tissue sample collection (e.g., infection).	
80	Section 7.1.3	Key Issue	<i>...intake and effluent discharge pipes will be screened, in accordance with Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the Fisheries Act and its regulations, to prevent fish impingement or entrainment; and effluent discharge pipes will be equipped with diffusers to slow water velocity at the discharge point. The ends of intake and effluent pipes will be pointed upwards to avoid scouring and disturbing sediments.</i>	The Proponent does not agree that fish screens need to be installed on the end of effluent pipes. This is because there is no risk of fish being entrained in effluent pipes that are discharging effluent to the environment. However, Alamos does agree that fish screens need to be installed on water intakes because intakes may entrain fish as water is withdrawn from the receiving environment.	Please revise to " <i>...intake pipes will be screened, in accordance with Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the Fisheries Act and its regulations, to prevent fish impingement or entrainment; and effluent discharge pipes will be equipped with diffusers to slow water velocity at the discharge point. The ends of intake pipes will be pointed upwards to avoid scouring and disturbing sediments.</i> "
81	Section 7.1.3	Showstopper	<i>Prior to discharge of water from the Wendy and East pit lakes to Farley Lake during construction, contact water collection ditches to Farley Lake during construction, operation, and decommissioning/closure, and groundwater interceptor wells to Farley Lake and Gordon Lake during operation, water will be heated or cooled, when required, to maintain the temperature regime in both lakes (i.e., water will only be discharged when it is within 2°C of background water temperatures). To the extent possible, collected water will be discharged outside of burbot winter spawning periods, as determined by Fisheries and Oceans Canada, to limit effects to egg incubation and juvenile recruitment.</i>	The Proponent agrees that mitigation of potential changes in water temperature in Gordon Lake and Farley Lake due to dewatering of Wendy and East pits and discharge of contact water and groundwater interceptor water is required. However, Alamos does not consider the requirement to discharge pit water, contact water, or groundwater only when it is within 2°C of background as feasible or warranted. This is because the potential for any effluent to alter the temperature of the receiving environment is dependent not only on the temperature of the effluent but also the volume of the effluent discharge (i.e., the thermal load) and the volume and temperature of the receiving environment (i.e., thermal mass). Because fish and aquatic biota live in the lakes and not in the effluent, Alamos proposes that this condition be altered so that the condition is to maintain water temperatures in the lakes within 2°C of background, not the temperature of the effluent. Additionally, Alamos does not consider the requirement of prohibiting discharge of pit water, contact water, or groundwater during the burbot spawning period as feasible or warranted. Alamos cannot operate the Gordon mine without discharging contact water and/or groundwater in late winter when burbot are spawning. Also, burbot have not been captured in Gordon Lake or Farley Lake during any of the baseline field surveys	Please revise to "Water discharged from Wendy and East pit lakes to Farley Lake during construction, contact water discharged from collection ponds to Farley Lake during construction, operation, and decommissioning/closure, and groundwater discharged from interceptor wells to Gordon and Farley Lakes will be heated or cooled, as required, or at a rate sufficient to maintain water temperatures of Gordon or Farley Lakes within 2°C of background as determined by temperature monitoring equipment installed in Gordon and Farley lakes and/or reference lakes prior to mine construction. To the extent possible, the volume of effluent that is ±2°C of background water temperatures in Gordon and Farley Lake will be temporarily stored to equalize temperatures prior to discharge or released at rates that will minimize temperature changes during the burbot winter spawning period, as determined by Fisheries and Oceans Canada, to limit effects to egg incubation and juvenile recruitment."

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				<p>conducted for the Project. While this doesn't confirm that burbot are not present in Farley Lake, it does suggest that their numbers are low and any change in water temperature in Farley Lake in winter is likely to affect only a portion of the burbot population in the LAA. Lastly, the likelihood of effluent discharge from the Gordon site changing the water temperature of Farley Lake in winter is low because most, if not all contact water will be frozen, and because any liquid effluent present will be at or near the temperature of water in Farley Lake (i.e., within 1°C or 2°C of freezing).</p>	
82	Section 7.1.3	Key Issue	<p><i>A fish habitat offsetting plan that is compliant with the Authorizations Concerning Fish and Fish Habitat Protection Regulations pursuant to the Fisheries Act will be developed, in consultation with relevant provincial and federal authorities and Indigenous nations, and to the satisfaction of Fisheries and Oceans Canada, to counter-balance residual harmful alteration, disruption, or destruction of fish habitat, and death of fish. The plan will be shared with Indigenous nations and the Indigenous Environmental Advisory Committee at least 30 days prior to formal submission to Fisheries and Oceans Canada.</i></p>	<p>The Proponent does not agree that the fish habitat offset plan needs to be shared with the Environmental Advisory Committee (EAC) at least 30 days prior to formal submission to Fisheries and Oceans Canada as it is Alamos' opinion that the timing of this federal authorization application does not need to be formally tied to the creation of the EAC. Alamos remains committed to participating and providing information to the EAC. Alamos also remains committed to engaging with local Indigenous Nations during development of the fish habitat offsetting plan. However, the timing of when the EAC is struck and when its membership and Terms of Reference can be agreed upon is unknown and largely not in Alamos' control. As such, linking the EAC to a federal authorization that will have implications for the Project's schedule is unwarranted.</p>	<p>Please revise to "<i>The Proponent shall develop, prior to construction and to the satisfaction of Fisheries and Oceans Canada and through engagement with local Indigenous Nations and implement an offsetting plan to mitigate residual effects to fish and fish habitat associated with the carrying out of the designated Project. The Proponent shall submit the approved offsetting plan to the Agency prior to implementation. The plan will also be made available to local Indigenous Nations and the Environmental Advisory Committee prior implementation.</i>"</p>
83	Section 7.1.3	Key Issue	<p><i>Prior to construction, a follow-up program will be developed, in consultation with Indigenous nations and relevant federal and provincial authorities, to monitor changes to calcium and magnesium concentrations; plankton, periphyton, and benthic invertebrate communities; fish health, growth, survival, and reproduction, including spawning success and juvenile recruitment; the population status, habitat usage, and habitat availability for lake sturgeon populations within the Keewatin River and Hughes River; and fish habitat availability and quality (i.e. including aquatic vegetation) to verify the results</i></p>	<p>The Proponent is unclear why calcium and magnesium have been singled out for inclusion in the water quality monitoring program. Alamos suggests that specific reference to monitoring of calcium and magnesium is removed from this sentence.</p> <p>The Proponent disagrees with inclusion of plankton and periphyton communities in the follow-up and monitoring program for the Project. Plankton and periphyton communities are highly variable, seasonally and spatially, and require years of baseline data collection to characterize this variability for identification of statistically significant differences "before" and "after" and/or between "impact" and "reference" sites. However, Alamos intends on including chlorophyll a concentration as a metric for</p>	<p>Please revise to "<i>Prior to construction, a follow-up program will be developed, through engagement with local Indigenous Nations and in consultation with relevant federal and provincial authorities, to monitor potential changes in surface water quality, and statistically significant changes in primary and secondary producer communities, fish tissue residue concentrations, and fish habitat metrics downstream of the Gordon and MacLellan site to verify results of the environmental assessment, verify the effectiveness of mitigation measures, and inform the need for contingency measures. The fish species to be monitored and the</i></p>

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			<p><i>of the environmental assessment, verify the effectiveness of mitigation measures, and inform the need for contingency measures. This follow-up program will be implemented during all project phases and will align with Environment and Climate Change Canada's Metal Mine Technical Guidance for Environmental Effects Monitoring.</i></p>	<p>monitoring potential change and benthic invertebrate community metrics.</p> <p>Alamos also disagrees that monitoring of fish populations and habitat use should be included in the follow-up and monitoring program. Fish populations also exhibit high natural variability and typically require as many as 10 years of baseline data to characterize the variability in metrics such as population size, age and size structure, growth rate and annual recruitment. Therefore, detecting statistical differences in fish population metrics is unlikely to be successful; multi-season and multi-year sampling of fish populations is also likely to pose of risk to these fish population due to high mortality rates in the fishing gears necessary to collect these data. Instead, Alamos proposes that changes in fish habitat be used in the follow-up and monitoring plan. Habitat metrics (e.g., density and spatial extent of aquatic vegetation) are less variable and can be measured more easily and more accurately than fish populations.</p> <p>Finally, the Proponent disagrees with monitoring the population status, habitat usage, and habitat availability for lake sturgeon in the Keewatin River and Hughes River. First, as indicated in the EIS, the Project is not expected to have any measurable effect on flows or water quality in either river. Second, monitoring lake sturgeon in the Keewatin River and Hughes River would rely on the capture of lake sturgeon using gillnets. This would pose a mortality risk to a population of fish identified by COSEWIC as "endangered". Third, the success of any such monitoring would rely on the characterization of the natural variability in the lake sturgeon population and its habitat use. Finally, Alamos has already committed to funding a lake sturgeon research and assessment program as a complementary measure in the fish habitat offsetting plan using field methods proven effective by previous work funded by Manitoba Hydro. Given the above, it is Alamos' opinion that monitoring of lake sturgeon in the Keewatin River and Hughes River beyond that which it is already committed to in the fish habitat offsetting plan is unwarranted.</p>	<p><i>methods to monitor them will be developed through engagement with local Indigenous Nations and may include species of cultural importance. The follow-up program will be implemented during all project phases and will align with Environment and Climate Change Canada's Metal Mine Technical Guidance for Environmental Effects Monitoring."</i></p>
84	Section 7.1.3	Key Issue	<p><i>At a minimum, monitoring will be conducted in Farley Lake, Gordon Lake, Farley Creek, Minton Lake, the Hughes River, the new diversion</i></p>	<p>The Proponent agrees that the follow-up and monitoring program will, at a minimum, include Farley Lake, Gordon Lake, Farley Creek, Minton Lake, the new diversion channel, and the Keewatin River.</p>	<p>Please revise to "<i>At a minimum, monitoring will be conducted in Farley Lake, Gordon Lake, Farley Creek, Minton Lake, the new diversion</i></p>

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			<p><i>channel, the Keewatin River, and in any additional locations determined in consultation with relevant authorities during review of final monitoring plans.</i></p>	<p>However, except for water quality monitoring, Alamos does not agree that monitoring of biological communities should extend downstream as far as the Hughes River. As stated in the EIS, Alamos does not expect any measurable change in water quality, water quantity, or fish habitat in the Hughes River during any stage of the Project. Also, Alamos is committed to developing the study design for the follow-up and monitoring program with the EAC once it is struck.</p>	<p><i>channel, the Keewatin River, and in any additional locations determined in consultation with...."</i></p>
85	Section 7.1.3	Key Issue	<p><i>The list of fish species to be monitored will be developed in consultation with Fisheries and Oceans Canada, Indigenous nations, and other relevant federal and provincial authorities and, at a minimum, will include lake sturgeon, burbot, northern pike, lake whitefish, and white sucker.</i></p>	<p>Alamos is committed to developing the list of fish species that will be included in the follow-up and monitoring program with federal and provincial authorities and the EAC once it is struck. However, Alamos does not agree that lake sturgeon and burbot should be included in the follow-up monitoring program because; 1) lake sturgeon are only found in the Keewatin River and Hughes River where effects of the project are not expected to be measurable; 2) lake sturgeon and burbot are relatively rare, not widely distributed in the LAAs and are difficult to catch with the available fishing gears in the habitats present in the LAAs; 3) it is unlikely that sample sizes sufficient for statistical analysis can be collected; and 4) targeting these species is likely to result in mortalities that may pose unnecessary risks to their populations. However, Alamos is willing to discuss the logistical constraints, risks, and potential benefits of collecting tissue samples from either species within the LAAs as part of the follow-up monitoring program.</p>	<p>Please revise to "<i>The list of fish species to be monitored will be developed in consultation with Fisheries and Oceans Canada, engaged Indigenous Nations, and other relevant federal and provincial authorities.</i>"</p>
86	Section 7.1.3	Key Issue	<p><i>Prior to construction, the amount and quality of fish habitat present and fish utilization of habitat in Farley Creek at the Gordon site will be monitored to establish a baseline to inform follow-up and monitoring programs.</i></p>	<p>The Proponent described the safety and logistical reasons and habitat constraints limiting the effectiveness of capturing fish in Farley Creek in its responses to Information Requests submitted during the review process. Therefore, Alamos does not agree that monitoring fish utilization of Farley Creek should be a component of the follow-up and monitoring program. Instead, Alamos proposes that the follow-up and monitoring program be limited to monitoring fish habitat metrics such as abundance and distribution of beaver dams, density and spatial extent of aquatic vegetation, changes in channel morphology and changes in water depth and water velocity. These habitat metrics are more easily and reliably measured than fish metrics while still providing for identification of</p>	<p>Please revise to "<i>Prior to construction, the amount and quality of fish habitat present in Farley Creek at the Gordon site will be monitored to establish a baseline to inform follow-up and monitoring programs.</i>"</p>

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				statistically significant differences between “before” and “after” and “impact” and “control” data.	
87	Section 7.1.3	Key Issue	<i>Prior to construction, plankton, periphyton, and benthic invertebrate communities present in Farley Lake, Gordon Lake, Farley Creek, the Hughes River, the Keewatin River, Minton Lake, the new diversion channel, and any additional locations determined in consultation with relevant authorities during review of final monitoring plans, will be monitored to establish a baseline to inform follow-up and monitoring, including the detection of project-related changes in nutrient and contaminant levels, and food web dynamics. Benthic invertebrate monitoring parameters will include total invertebrate density, taxon richness, Simpson’s Evenness Index, and Bray-Curtis Index.</i>	Alamos is concerned with inclusion of monitoring potential changes in “food web dynamics” as a condition of the Project’s license. Food web dynamics suggests monitoring all components of the aquatic environment in sufficient detail and intensity to understand how changes in water quality, water quantity, ice regime, etc., may affect the abundance, diversity, distribution of biotic communities at all trophic levels, and the energy transfer between these trophic levels as determined by inter-species competition, predatory-prey relationships, and habitat limitations. It is Alamos’ opinion that such a requirement is beyond what is required by provincial and federal regulators for other mining projects or required by federal or provincial technical effects monitoring guidance. Alamos is also concerned that such as requirement would be near impossible to detect any statistically significant differences in any “food web dynamic” metric(s) within the time frame of the Project if it were to be included as a requirement in the follow-up and monitoring program.	Please remove reference to food web dynamics and revise to: “...including the detection of project-related changes in nutrient and contaminant levels. Benthic invertebrate monitoring parameters...”
88	Section 7.1.3	Recommendation	<i>Water temperatures in Gordon Lake, Farley Lake, Farley Creek, Minton Lake, the Hughes River, the Keewatin River, the new diversion channel, and any additional locations determined in consultation with relevant authorities during review of final monitoring plans will be monitored during all project phases to verify the results of the environmental assessment, verify the effectiveness of mitigation measures, and inform the need for contingency measures.</i>	The Proponent agrees that monitoring water temperatures in Gordon Lake, Farley Lake, Farley Creek, Minton Lake, and other smaller lakes and streams in the LAAs should be part of the follow-up and monitoring plans. However, the Proponent does not agree that monitoring water temperatures in the Keewatin River and Hughes River is warranted. This is because the potential change in water quality, water quantity, and water temperature in either river is extremely low given that the thermal load added to both rivers is expected to be negligible in comparison to the thermal mass of both rivers during all phases of the Project.	Please revise to “Water temperatures in Gordon Lake, Farley Lake, Farley Creek, Minton Lake, the new diversion channel, and any additional location determined in consultation with relevant authorities....”
89	Section 7.2.3	Key Issue	<i>If vegetation clearing and/or construction activities cannot occur outside of migratory bird breeding periods, as described in Environment and Climate Change Canada’s General Nesting Periods for Migratory Birds, additional mitigation measures will be implemented to protect migratory birds, their eggs, and their nests, including</i>	Construction will occur year-round but clearing will occur outside of the migratory bird breeding period. If clearing is required during the breeding period, a qualified biologist will inspect the site for occupied nests (for all birds including SAR).	Please revise to “If vegetation clearing activities cannot occur outside of migratory bird breeding periods, as described in Environment and Climate Change Canada’s General Nesting Periods for Migratory Birds, additional mitigation measures will be implemented to protect migratory birds, their eggs, and their nests, including

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			<i>non-intrusive bird surveys, which will be conducted within the Gordon and MacLellan site PDAs prior to construction to identify nests of migratory bird and bird species at risk, including common nighthawk, olive-side flycatcher, barn swallow, bank swallow, short-eared owl, horned grebe, yellow rail, evening grosbeak, and rusty blackbird. Based on the results of surveys, buffer zones and setback distances around nests will be established prior to construction and in consultation with Indigenous nations and other relevant federal and provincial authorities, taking into account the Manitoba Conservation Data Centre's Recommended Development Setback Distances and Restricted Activity Periods for Birds by Wildlife Feature Type (2021), to protect nests and prevent mortality. Buffer zones and setbacks will be maintained during vegetation clearing and site preparation activities.</i>		<i>non-intrusive bird surveys, which will be conducted within the Gordon and MacLellan site PDAs within seven days of planned vegetation removal or ground disturbance to identify nests of migratory birds, including bird species at risk (i.e., common nighthawk, olive-side flycatcher, barn swallow, bank swallow, short-eared owl, horned grebe, yellow rail, evening grosbeak, and rusty blackbird). Based on the results of surveys, buffer zones and setback distances around nests will be established prior to clearing, taking into account the Manitoba Conservation Data Centre's Recommended Development Setback Distances and Restricted Activity Periods for Birds by Wildlife Feature Type (2021), to protect nests and prevent mortality. Buffer zones and setbacks will be maintained until nests are unoccupied."</i>
90	Section 7.3.1 Table 15	Deviation	<i>Caribou, barren-ground population; Rangifer tarandus; RAA</i>	This table includes species potentially affected by the Project. The EIS was explicit that the current range of barren ground caribou does not overlap with the RAA.	Please revise Table 15 as follows: <ul style="list-style-type: none"> Remove barren ground caribou Include those species potentially affected by the project: wolverine, woodland caribou, little brown myotis, northern myotis, common nighthawk, olive-sided flycatcher, barn swallow, rusty blackbird
91	Section 7.3.1	Recommendation	<i>Northern leopard frog; Lithobates pipiens; RAA</i>	The RAA overlaps with the northern extent of Northern leopard frog range however it has not been detected in the RAA in over a decade. It was concluded that this species would not be affected by the Project.	Please revise Table 15 as follows: <ul style="list-style-type: none"> Remove Northern leopard frog
92	Section 7.3.1	Deviation	<i>The remaining species at risk identified in Table 15 were not known to regularly occupy the RAA and were considered unlikely to be present in the RAA due to a lack of suitable breeding habitat; therefore effects to these species were not assessed further.</i>	The statement is not consistent with the EIS. Section 7.3.1 of the EA report states: "Eight amphibian, mammal, and insect species at risk were identified by the Proponent as potentially occurring in the LAAs and RAA (Table 15) yet the EIS lists 17 species. Table 15 title states SAR potentially affected by the Project but includes species that were screened out of the EIS. Table 15 should only list wolverine, woodland caribou,	Please revise to " <i>The remaining species at risk having range overlap with the Project are horned grebe, yellow rail, short-eared owl, bank swallow, and evening grosbeak. These species are not known to regularly occupy the RAA and are unlikely to be affected by the Project due to a lack of</i>

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				little brown myotis, northern myotis, common nighthawk, olive-sided flycatcher, barn swallow, rusty blackbird	<i>suitable breeding habitat in the RAA. Similarly, the Project does not overlap the modern range of barren-ground caribou and are not assessed. Northern leopard frog is not assessed as the species is unlikely to regularly occupy the RAA and they have not been detected in waterbodies with the potential to be affected by the Project.</i>
93	Section 7.3.1	Deviation	<i>Further, due to the known distribution of boreal caribou within their population range, interactions with the Project were considered unlikely; however, data on the boreal caribou herd that may be affected by the Project is somewhat limited. Effects to caribou habitat were predicted to be temporary and reversible following reclamation.</i>	This statement is incorrect.	Please revise to “ <i>Further, there is no baseline data, engagement information, traditional knowledge or traditional land and resource use information to suggest that boreal caribou will interact with the Project; however, data on the boreal caribou herd in habiting parts of the RAA is somewhat limited. Effects to caribou habitat were predicted to be temporary and reversible following reclamation.</i> ”
94	Section 7.3.1	Recommendation	<i>While the possibility of species at risk mortality as a result of human-wildlife encounters (e.g., removal of dangerous wildlife or wildlife pests) would exist at the Gordon and MacLellan sites, the likelihood of this effect occurring at the MacLellan site would be greater due to higher staffing levels.</i>	“human-wildlife encounters” is better worded as “human-wildlife conflict” in this context.	Suggest rephrasing to “ <i>While the possibility of species at risk mortality as a result of human-wildlife conflict (e.g., removal of dangerous wildlife or wildlife pests) would exist at the Gordon and MacLellan sites, the likelihood of this effect occurring at the MacLellan site would be greater due to higher staffing levels.</i> ”
95	Section 7.3.1 Figure 6	Deviation	<i>Figure 6 Federal and Provincial Boreal Caribou Habitat Ranges in Relation to the Gordon and MacLellan Sites</i>	Figure 6 still has the previous MacLellan site project development area (PDA).	Please revise Figure 6 to show the updated MacLellan site PDA.
96	Section 7.3.2	Deviation	<i>Sayisi Dene First Nation stated that boreal caribou are an important species to their Nation, including for governance and autonomy.</i>	Sayisi Dene First Nation Impact Assessment Report 2021 states caribou are an important species to their Nation but do not specify this is boreal caribou. “Caribou” is used generically throughout the EA report although multiple references to caribou migration are made which suggests the barren-ground caribou type.	Please revise to “ <i>Sayisi Dene First Nation stated that caribou are an important species to their Nation, including for governance and autonomy.</i> ”
97	Section 7.3.3	Deviation	<i>The Agency agrees with Mathias Colomb Cree Nation’s recommendation that site preparation activities be conducted outside of the boreal caribou calving and calf-rearing period (i.e., May 1 to June 30) regardless of</i>	Alamos is committed to clearing vegetation and conducting site preparation activities outside of the breeding bird period and bat roosting period which is May 1 – August 31. The caribou calving and calf-rearing period falls within this time frame, therefore site	Please revise to state that vegetation clearing, and other site preparation activities, will be conducted outside of the May 1 - August 31 breeding bird and bat roosting periods, which overlap

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			<i>whether individuals are detected within the PDAs or LAAs,</i>	preparation activities are planned to occur outside the caribou calving and calf-reading period.	with the caribou calving and calf-rearing period. Refer also to Item 89.
98	Section 7.3.3	Recommendation	<i>Linear project features, such as the distribution line right of way and access roads, will be decommissioned and reclaimed when no longer required, to mitigate increased predation of boreal caribou.</i>	This is correct, but only if government agencies or local Indigenous Nations do not want access.	Please revise to " <i>The distribution line right of way will be decommissioned and reclaimed when no longer required, to mitigate the potential increase in predation risk associated with increased access. The Proponent will, through engagement with local Indigenous Nations and in consultation with relevant government agencies, determine if existing access roads will be decommissioned and reclaimed when no longer required, to mitigate the potential increase in predation risk associated with increased access.</i> "
99	Section 7.3.3	Key Issue/Deviation	<i>The Proponent will participate in regional initiatives related to the management of adverse effects on boreal caribou during all project phases, including the collaring program proposed by the Province of Manitoba for boreal caribou, at the request of the relevant authorities responsible for these initiatives.</i>	The wording here is inconsistent with the wording in the T&Cs.	Please revise to be consistent with T&Cs: " <i>The Proponent shall participate in regional initiatives related to the management of adverse effects on boreal caribou (Rangifer tarandus caribou), from construction through the end of operations, at the reasonable request of the relevant authorities responsible for these initiatives. In doing so, the Proponent shall determine, through engagement with local Indigenous Nations and in consultation with relevant authorities, how the Proponent shall participate.</i> "
100	Section 7.3.3	Recommendation	<i>Prior to construction, a follow-up program will be developed, in consultation with Environment and Climate Change Canada, other relevant federal and provincial authorities, and Indigenous nations, to monitor project effects to species at risk (i.e., little brown myotis, northern myotis, wolverine, boreal caribou, and northern leopard frog), including potential effects to habitat within the PDAs and LAAs, mortality risk, and species at risk health,</i>	Monitoring of "species at risk health" is broad and difficult to implement; it would be more appropriate in this context to refer to "risk to wildlife health".	Please revise to " <i>Prior to construction, a follow-up program will be developed, in consultation with Environment and Climate Change Canada, other relevant federal and provincial authorities, and through engagement with local Indigenous Nations, to monitor project effects on species at risk (i.e., little brown myotis, northern myotis, wolverine, and boreal caribou), including potential effects on habitat within the PDAs and LAAs, mortality risk, and risk to wildlife health.</i> "

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Item	Section	Rank	Excerpt	Comment	Suggestion
101	Section 7.4.1.3	Recommendation	<i>To mitigate effects to current use, the Agency recommends that the Proponent avoid the removal of plant species of cultural importance to Indigenous Peoples within the PDAs.</i>	Avoidance of plant species of cultural importance to Indigenous Peoples is not possible as the full PDAs will be cleared.	Please revise to “ <i>To mitigate effects to current use, the Proponent will provide notice of clearing activities and access during suitable periods of the growing season for local Indigenous Nations to collect plant species of cultural importance to Indigenous Peoples within the PDAs.</i> ”
102	Section 7.4.3	Key Issue	<i>All Indigenous nations will be provided an opportunity to participate on this Committee.</i>	Replace “all Indigenous nations” with “all engaged Indigenous Nations.” for consistency to the T&Cs.	<u>Global Edit:</u> please replace “ <i>will allow Indigenous nations</i> ” with “ <i>will allow all engaged Indigenous Nations</i> ” throughout the EA report.
103	Section 7.4.3	Key Issue	<i>The Proponent will provide safe, alternative means for accessing harvesting and cultural use sites in the Gordon and MacLellan site LAAs that are made inaccessible due to project activities.</i>	As written, this condition is open to interpretation, and it is not clear how compliance with the condition might be determined.	Please revise to “ <i>The Proponent will engage local Indigenous Nations to address changes in access to lands and resources currently used for traditional purposes through timing of Project activities, potential scheduling of construction, signage, and identification of potential alternate routes of access, including portages, where required.</i> ”
104	Section 7.4.3	Key Issue	<i>If removal or disturbance of plants of traditional and cultural importance to Indigenous Peoples is required for the construction of project components, the Proponent will allow Indigenous nations to collect individual plants or seeds for transplantation or replanting.</i>	Replace “will allow Indigenous nations” with “will allow all engaged Indigenous Nations.”	<u>Global Edit:</u> please replace “ <i>will allow Indigenous nations</i> ” with “ <i>will allow all engaged Indigenous Nations</i> ” throughout the EA report.
105	Section 7.4.3	Showstopper	<i>Blasting will not be conducted during statutory holidays, days of cultural importance to Indigenous Peoples, as identified in consultation with Indigenous nations, unless required for safety reasons.</i>	It is not technically or economically feasible to commit to no blasting on statutory holidays. Days of cultural importance are not defined in the regulatory record for this Project and may be interpreted to include events such as the death of an Elder or other unpredictable community events that would be very challenging for the Proponent to anticipate or schedule around.	Please revise to “<i>The Proponent will inform local Indigenous Nations of blasting activities and monitoring results. The Proponent will develop protocols with local Indigenous Nations that would serve to inform Indigenous land users of blasting or an anticipated blasting schedule ahead of time such that local receptors can prepare, and the resulting nuisance and startle responses are reduced.</i>”
106	Section 7.4.3	Key Issue	<i>Indigenous nations will be provided an opportunity to conduct ceremonies prior to construction for any sites of</i>	As currently written, this requirement is considered unreasonable.	Please revise to: “ <i>The Proponent will engage with local Indigenous Nations to</i>

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Item	Section	Rank	Excerpt	Comment	Suggestion
			<i>significance for which disturbance cannot be avoided.</i>		<i>identify interest in conducting a ceremony(ies) prior to construction”.</i>
107	Section 7.4.3	Recommendation	<p><i>Interested Indigenous nations will be provided opportunities to:</i></p> <ul style="list-style-type: none"> <i>monitor for the presence of physical and cultural heritage resources and sites of significance, including chance finds, during any land disturbance activities during construction, operation, and decommissioning/closure; and</i> <i>participate in follow-up and monitoring programs for all valued components of interest to Indigenous nations.</i> 	<p>“Interested Indigenous nations” should be “Engaged Indigenous Nations”</p> <p>Monitoring will be done through follow up and monitoring programs. The opportunity to monitor for the presence of physical and cultural heritage resources is too broad.</p>	<p>Please revise to “<i>Engaged Indigenous Nations will be provided opportunities to monitor for the presence of physical and cultural heritage resources and sites of significance, including chance finds, during any land disturbance activities during construction, operation, and decommissioning/closure through participation in follow-up and monitoring programs.</i>”</p>
108	Section 7.5.1.2	Recommendation	<p><i>Chemawawin Cree Nation, Mathias Colomb Cree Nation, Peter Ballantyne Cree Nation, Mathias Colomb Cree Nation, Sayisi Dene First Nation, and Chemawawin Cree Nation expressed concerns regarding the Proponent’s methodology for determining potential effects to Indigenous Peoples’ health, including the lack of community-specific engagement in determining potential effects and in collecting baseline data to support the assessment.</i></p>	<p>Several Indigenous Nations are listed multiple times in same sentence.</p>	<p>Please remove the repeated Indigenous Nations.</p>

Section 8 – Other Effects Considered

Item	Section	Rank	Excerpt	Comment	Suggestion
109	Section 8.1.3	Recommendation	<p><i>Indigenous nations will be consulted prior to construction regarding mitigation measures developed to prevent a dam breach, including details of the likelihood, modes of failure, and consequences of a dam breach or failure.</i></p> <p><i>A plan for accidents and malfunctions describing the means of communication, notification procedures, and urgent and long-term communication requirements for possible emergency event types will be</i></p>	<p>This is the Emergency Response Plan.</p>	<p>Please revise to “<i>Local Indigenous Nations will be engaged prior to construction regarding mitigation measures developed to prevent a dam breach, including details of the likelihood, modes of failure, and consequences of a dam breach or failure.</i></p> <p>The Lynn Lake Gold Project Emergency Response and Spill Prevention and Contingency Plan, describing the means of communication, notification procedures, and urgent and long-term</p>

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Item	Section	Rank	Excerpt	Comment	Suggestion
			<i>developed prior to construction and will include notification of affected Indigenous nations.</i>		communication requirements for possible emergency event types will be developed prior to construction and will include notification of affected Indigenous Nations.”
110	Section 8.2	Recommendation	<p><i>Section 8.2.1 Proponent’s Assessment of Environmental Effects, Geological Hazards Wind and water erosion at the project sites could cause removal or movement of topsoil, degradation of soil quality and stability, and sedimentation in areas surrounding the PDAs. Wind and water erosion were identified as high and low risk, respectively, at the Gordon and MacLellan sites.</i></p> <p><i>Thawing of permafrost at the Gordon and MacLellan sites could cause subsidence, as permafrost is present within both PDAs. Potential effects of subsidence could include building damage or collapse, power outages, twisting or damaging of roads, and damage to underground infrastructure such as pipes. However, the Proponent anticipated that the potential for subsidence and terrain instability within the PDAs would be limited, as permafrost soils would be removed as part of site preparation and construction activities.</i></p>	General comments on Section 8.2 - Proponent’s Assessment of Environmental Effects. The Agency says that the Proponent anticipates that permafrost soils will be removed as part of site preparation and construction. This is inaccurate as currently written.	Please revise to “...as permafrost soils would be removed where appropriate as part of...”
111	Section 8.2.3	Recommendation	<i>The Project will be designed in consideration of available Indigenous knowledge of historic flooding in the LAAs and projections of climate change-related scenarios, in consultation with Indigenous nations and relevant authorities, prior to construction.</i>	Indigenous knowledge about historic flooding and projections of climate change may not be readily available. Available Indigenous knowledge may not be relevant or applicable to Project design.	Please revise to “The Project will work with engaged Indigenous Nations through the Environmental Advisory Committee, as well as relevant authorities, to offer opportunities for Indigenous Nations to share Indigenous knowledge of historic flooding in the LAAs and projections of climate change-related scenarios, to be considered in design of the Project as relevant and applicable, prior to construction.”

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Appendix B – Local and Regional Assessment Areas

Item	Section	Rank	Excerpt	Comment	Suggestion
112	Appendix B Figure C-1	Deviation	<i>Figure C-1 Local and Regional Assessment Area for Air Quality</i>	Figure C-1 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-1 to include the updated MacLellan site PDA.
113	Appendix B Figure C-3	Deviation	<i>Figure C-3 Local and Regional Assessment Areas for Noise and Vibration for the MacLellan Site</i>	Figure C-3 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-3 to include the updated MacLellan site PDA.
114	Appendix B Figure C-5	Deviation	<i>Figure C-5 Local and Regional Assessment Areas for Groundwater for the MacLellan Site</i>	Figure C-5 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-5 to include the updated MacLellan site PDA.
115	Appendix B Figure C-7	Deviation	<i>Figure C-7 Local Assessment Area for Surface Water for the MacLellan Site</i>	Figure C-7 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-7 to include the updated MacLellan site PDA.
116	Appendix B Figure C-8	Deviation	<i>Figure C-8 Regional Assessment Area for Surface Water for the Gordon and MacLellan Sites</i>	Figure C-8 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-8 to include the updated MacLellan site PDA.
117	Appendix B Figure C-10	Deviation	<i>Figure C-10 Local Assessment Area for Fish and Fish Habitat for the MacLellan Site</i>	Figure C-10 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-10 to include the updated MacLellan site PDA.
118	Appendix B Figure C-11	Deviation	<i>Figure C-11 Regional Assessment Area for Fish and Fish Habitat for the Gordon and MacLellan Sites</i>	Figure C-11 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-11 to include the updated MacLellan site PDA.
119	Appendix B Figure C-12	Deviation	<i>Figure C-12 Local and Regional Assessment Areas for Vegetation and Wetlands</i>	Figure C-12 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-12 to include the updated MacLellan site PDA.
120	Appendix B Figure C-13	Deviation	<i>Figure C-13 Local and Regional Assessment Areas for Wildlife and Wildlife Habitat</i>	Figure C-13 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-13 to include the updated MacLellan site PDA.
121	Appendix B Figure C-14	Deviation	<i>Figure C-14 Local and Regional Assessment Areas for the Current Use of Lands and Resources for Traditional Purposes by Indigenous Peoples</i>	Figure C-14 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-14 to include the updated MacLellan site PDA.
122	Appendix B Figure C-15	Deviation	<i>Figure C-15 Local Assessment Areas for Indigenous Health and Socio-economic Conditions and Physical and Cultural Heritage</i>	Figure C-15 still has the previous MacLellan site project development area (PDA).	Please revise Figure C-15 to include the updated MacLellan site PDA.

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Potential Terms and Conditions

Section 1 – Definitions

Item	Condition	Rank	Excerpt	Comment	Suggestion
1	1.22	Recommendation	<i>Indigenous groups means the following Aboriginal Peoples:</i>	Indigenous groups should be replaced with local Indigenous Nations.	<u>Global Edit</u> : please replace “ <i>Indigenous groups</i> ” with “ <i>local Indigenous Nations</i> ” throughout the T&Cs.
2	1.22	Recommendation	<i>Indigenous groups means the following Aboriginal Peoples: Barren Lands First Nation, Chemawawin Cree Nation, Hatchet Lake First Nation, Manitoba Métis Federation, Marcel Colomb First Nation, Mathias Colomb Cree Nation, Pickerel Narrows Cree Nation.</i>	Pickerel Narrows Cree Nation is not considered a standalone Indigenous Nation. Pickerel Narrows Cree Nation is a satellite Indigenous Nation of Mathias Colomb Cree Nation and is referred to as Granville Lake.	Please remove reference to Pickerel Narrows Cree Nation.

Section 2 – General Conditions

Item	Condition	Rank	Excerpt	Comment	Suggestion
3	2.1	Key Issue	<i>The Proponent shall ensure that its actions in meeting the conditions set out in this document during all phases of the Designated Project are considered in a careful and precautionary manner.</i>	Replace the words “shall ensure”.	Please revise to read as follows: <i>The Proponent shall, to the extent possible, carry out its actions in meeting the conditions set out in this document during all phases of the Designated Project in a careful and precautionary manner.</i>
4	2.3	Recommendation	<i>The Proponent shall, where consultation is a requirement of a condition set out in this document:</i>	To limit potential confusion between the Proponent’s engagement activities and the Crown’s duty to consult (<i>Constitution Act</i> section 35) it is recommended that where it is used to refer to Alamos’ “consultation with Indigenous Nations”, that “consultation with...” be replaced with “through engagement with local Indigenous Nations”	<u>Global Edit</u> : please replace “ <i>consultation with Indigenous Nations</i> ” with “ <i>through engagement with local Indigenous Nations</i> ” throughout the T&Cs.
5	2.4	Recommendation	<i>The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this document, discuss with each Indigenous group with respect to the manner...</i>	The Proponent intends to share information with the Environmental Advisory Committee, which will be comprised of engaged Indigenous Nations.	Please revise to “ <i>The Proponent shall, where consultation with Indigenous Nations is a requirement of a condition set out in this document, share with the Environmental Advisory Committee with respect to the manner...</i> ”

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Item	Condition	Rank	Excerpt	Comment	Suggestion
6	2.8.4	Key Issue	<i>...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 24 hours of any modified or additional mitigation measure being implemented.</i>	<p>These are very short turnaround times, and the definition of modify or additional is broad. 24 hours turnaround time not reasonable for a non-emergency situation.</p> <p>It is also requested that this exclude routine modifications, or measures that have already been committed to in the EIS (e.g., switching from one type of sediment and erosion control to another). The Proponent requests a written notification period of 72 hours for non-routine modifications.</p>	<p>Please revise to “...<i>The Proponent shall notify the Agency in writing within 72 hours of any non-routine modified or additional mitigation measure being implemented.</i>”</p>
7	2.9	Recommendation	<i>Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with each group and shall determine, in consultation with each group, opportunities for their participation in the implementation of the follow-up program,</i>	<p>As noted above, the Proponent intends to share information with the Environmental Advisory Committee, which will be comprised of engaged Indigenous Nations.</p> <p>Replace "each group" with "local Indigenous Nations and share information with the Environmental Advisory Committee." Please delete, "in consultation with each group". Delete "their".</p>	<p>Please revise to “<i>Where consultation with Indigenous Nations is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with each Indigenous Nation and shall determine, through engagement with local Indigenous Nations and through sharing information with the Environmental Advisory Committee, opportunities for participation in the implementation of the follow-up program.</i>”</p>
8	2.9	Recommendation	<i>The Proponent shall permit the participation of any interested Indigenous group in the identified follow-up program and training.</i>	<p>Replace the word permit. “Interested Indigenous nations” should be “engaged Indigenous Nations”</p>	<p>Please revise to “<i>The Proponent shall consider the participation of any engaged Indigenous Nations...</i>”</p>
9	2.10	Recommendation	<i>The Proponent shall prepare an annual report for each reporting year that sets out...</i>	<p>The condition assumes that all monitoring/follow-up programs are conducted annually. This is not necessarily true, and the frequency of sampling needs to be finalized based on the provincial and federal T&Cs, discussions with the Environmental Advisory Committee, and developed and approved Management and Monitoring Plans.</p>	<p>Please revise to “<i>The Proponent shall prepare reports for each reporting year that sets out....</i>”</p>
10	2.11	Recommendation	<i>The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.</i>	<p>Given the Project location and interested stakeholders, the requirement to include a plain language executive summary in both official languages is unnecessary.</p> <p>The condition that is referenced is incorrect.</p>	<p>Please delete “<i>including a plain language executive summary in both official languages.</i>”</p> <p>Please replace 2.9 with 2.10.</p>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
11	2.12	Key Issue	<p><i>The first reporting year for which the Proponent shall prepare an annual report pursuant to condition 2.9 shall start on the day the Minister of the Environment issues the Decision Statement to the Proponent pursuant to subsection 54 (1) of the Canadian Environmental Assessment Act, 2012.</i></p>	<p>This is not financially feasible. Reporting should start once the Proponent starts impacting the sites. The condition that is referenced is incorrect.</p>	<p>Please revise to “<i>The first reporting year for which the Proponent shall prepare an annual report pursuant to condition 2.10 shall start 60 days prior to the commencement of Project construction. The first year of reporting for an annual report should be for the March 31 after construction activities have started.</i>”</p>
12	2.13	Recommendation	<p><i>The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10</i></p>	<p>The conditions that are referenced are incorrect.</p>	<p>Please replace 2.9 and 2.10 with 2.10 and 2.11.</p>
13	2.16 2.17	Key Issue	<p><i>If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.7, the Proponent shall notify the Agency in writing in advance. As part of the notification, the Proponent shall provide:</i></p> <ul style="list-style-type: none"> • <i>a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the change(s);</i> • <i>any modified or additional measure to mitigate any environmental effect(s) that may result from the change(s) and any modified or additional follow-up requirement; and</i> • <i>an explanation of how, taking into account any modified or additional mitigation measure referred to condition 2.15.2, the environmental effects that may result from the change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment.</i> <p><i>The Proponent shall submit to the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.16, which may include the results of consultation with Indigenous groups and relevant</i></p>	<p>There appears to be no criteria provided on the magnitude or nature of change that would trigger these requirements. Criteria would be helpful (e.g., footprint change or new piece of infrastructure).</p>	<p>Please add in criteria on the magnitude or nature of change that would trigger these requirements. Suggest that any changes that exceed the requirements for federal involvement will follow 2.16. Any changes less than this threshold will only be reported to the Province of Manitoba.</p>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
			<i>authorities on the proposed change(s) and environmental effects referred to in condition 2.16.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2.</i>		

Section 3 – Fish and Fish Habitat

Item	Condition	Rank	Excerpt	Comment	Suggestion
14	3.1	Key Issue	<i>The Proponent shall develop, prior to construction and to the satisfaction of Fisheries and Oceans Canada and in consultation with Indigenous groups, and implement an offsetting plan to mitigate residual effects to fish and fish habitat associated with the carrying out of the designated Project. The Proponent shall share the proposed plan with Indigenous groups and the Indigenous Environmental Advisory Committee, as identified in condition 6.3, at least 30 days prior to formal submission to Fisheries and Oceans Canada, and submit the approved offsetting plan to the Agency prior to implementation.</i>	The Proponent does not agree that the fish habitat offset plan needs to be shared with the Environmental Advisory Committee (EAC) at least 30 days prior to formal submission to Fisheries and Oceans Canada. This is because Alamos does not agree that the timing of this federal authorization application needs to be tied to the creation of the EAC. Alamos remains committed to participating and providing information to the EAC and to continuing to engage with local Indigenous Nations during development of the fish habitat offsetting plan. However, the timing of when this EAC is struck and when its membership and Terms of Reference can be agreed upon is unknown and not in Alamos' control. As such, linking the EAC to a federal authorization that will have implications for the Project's schedule is unwarranted in Alamos' opinion.	Please revise to " <i>The Proponent shall develop, prior to construction and to the satisfaction of Fisheries and Oceans Canada and through engagement with local Indigenous Nations and implement an offsetting plan to mitigate residual effects to fish and fish habitat associated with the carrying out of the designated Project. The Proponent shall submit the approved offsetting plan to the Agency prior to implementation. The plan will also be made available to local Indigenous Nations and the Environmental Advisory Committee prior to implementation.</i> "
15	3.3	Key Issue	<i>The Proponent shall install exclusion screens on intake and effluent discharge pipes prior to their operation, while taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline, and in a manner consistent with the Fisheries Act and its regulations.</i>	The Proponent does not agree that fish screens need to be installed on the end of effluent discharge pipes because effluent discharge pipe do not withdraw water from the receiving environment and, therefore, do not pose a risk to fish due to entrainment in the inflow.	Please revise to " <i>The Proponent shall install exclusion screens on intake pipes prior to their operation, while taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline, and in a manner consistent with the Fisheries Act and its regulations.</i> "
16	3.4	Key issue	<i>The Proponent shall develop, prior to construction, and implement and maintain during all phases of the Designated Project, measures to mitigate any potential effects to water levels in Gordon Lake and Farley Lake due to groundwater drawdown as a result of Designated Project activities. These measures shall include intercepting and redirecting groundwater flowing towards the open pit with wells or installing a grout curtain or cut-off wall, before intercepted</i>	Condition, as written, limits the options for mitigation.	Please revise to " <i>The Proponent shall develop, prior to construction, and implement and maintain during all phases of the Designated Project, measures to mitigate potential effects to water levels in Gordon Lake and Farley Lake due to groundwater drawdown as a result of Designated Project activities. These measures shall include intercepting and redirecting groundwater flowing towards the open pit with wells, installing a grout curtain</i>

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			<i>groundwater enters the open pits and returning it into Gordon Lake and Farley Lake during construction and operation. The Proponent shall submit these measures to the Agency before implementing them.</i>		<i>or cut-off wall, or any other measure designed to maintain water levels in both lakes, before intercepted groundwater enters the open pits and returning it into Gordon Lake and Farley Lake during construction and operation. The Proponent shall submit information relating to these measures to the Agency, as notification, before implementing them."</i>
17	3.5.1	Key Issue	<i>...aerate water collected from the East and Wendy open pits, prior to release into Gordon Lake and Farley Lake to prevent chemical stratification and precipitation of oxides; and</i>	This condition, as written, limits the options for mitigation	Please revise to "...aerate, or treat by other means, water collected from the East and Wendy open pits, prior to release into Gordon Lake and Farley Lake if required to prevent chemical stratification and precipitation of oxides."
18	3.5.2	Showstopper	<i>...release collected water only when the collected water is within 2 degrees Celsius of background lake water temperatures, and outside of burbot (lota lota) winter spawning periods as determined by Fisheries and Oceans Canada.</i>	The Proponent does not consider the requirement of prohibiting discharge of pit water, contact water, or groundwater during the burbot spawning period as feasible or warranted. Alamos cannot operate the Gordon mine without discharging contact water and/or groundwater in late winter when burbot are spawning. However, the likelihood of effluent discharge from the Gordon site changing the water temperature of Farley Lake in winter or have a significant effect on burbot is low. First, most, if not all contact water will be frozen, and because any liquid effluent present will be at or near the temperature of water in Farley Lake (i.e., within 1°C or 2°C of freezing). Second, burbot do not use Gordon Lake for spawning because it is anoxic in late winter, conditions that adult burbot cannot survive. Third, while burbot absence of burbot in Farley Lake cannot be confirmed, the number of burbot using Farley Lake for spawning is likely low given that no burbot has ever being captured in Farley Lake during any field survey. This suggests any change in water temperature in Farley Lake in winter is likely to affect only a small portion of the burbot population in the LAA.	Please revise to: "...release contact water only when the thermal load of the effluent is insufficient to change the temperature of the receiving waterbody by more than 2 degrees Celsius."
19	3.6	Showstopper	<i>The Proponent shall, during construction, adjust the rate of discharge of water to Gordon Lake and Farley Lake from dewatering the</i>	This condition would prohibit pumping water from Wendy and East pits during construction and groundwater from the interceptor wells to Farley Lake during operation of the Gordon site. The rate	Please revise to "The Proponent shall implement an adaptive management and monitoring program regarding the rate of

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Item	Condition	Rank	Excerpt	Comment	Suggestion
			<i>existing East and Wendy pit lakes and the interceptor wells in order to match background flow rates in Farley Creek as identified in Volume 2 Chapter 10 of the Environmental Impact Statement and Appendix A Attachment IAAC-48 of the Proponent's IR Responses Round 1, Package 1 (Canadian Impact Assessment Registry Reference Number 80140, document #54).</i>	<p>of discharge proposed during the EIS was not anticipated to have negative effects on Farley Creek and therefore no adjustments are currently proposed.</p> <p>Refer to the monitoring criteria and thresholds provided in the EIS and Information Request responses (which commit to the monitoring of changes in channel geomorphology, beaver dams, hydraulic habitat in Farley Creek) for justification.</p>	<i>discharge of water to Farley Lake during the dewatering of the existing East and Wendy pit lakes during construction and the discharge of groundwater to Gordon and Farley Lakes from the interceptor wells during construction and operation. Flow rates will be adjusted, as necessary to maintain lake levels within the range of variability predicted in the EIS and if monitoring indicates that flow rates are resulting in exceedances of the habitat metrics in Farley Creek included in the Aquatic Effects Monitoring Program (AEMP), as identified through engagement with local Indigenous Nations and in consultation with relevant federal and provincial authorities."</i>
20	3.7	Key Issue	<i>The Proponent shall collect all contact water, effluent and seepage from the Project development areas, including seepage and recharge from the tailings management facility, mine rock storage areas, overburden and ore stockpiles, and seepage input to groundwater that flows into the open pits, and treat it, as necessary, before depositing it into the receiving environment during all phases of the Designated Project.</i>	Seepage from these facilities were noted in the EIS and the effect of the seepage on groundwater and groundwater that discharges to surface water was deemed not significant. It is not feasible or necessary to "collect all contact water...including seepage and recharge" from these facilities. For example, if the seepage from these facilities is no different in quality than background groundwater quality then there is no rationale to collect and treat this seepage. Therefore, we request the "as practical" is inserted to the condition after the words, "contact water".	Please revise to "The Proponent shall collect all contact water, effluent, and seepage from the Project development areas, including seepage and recharge from the tailings management facility, mine rock storage area, overburden and ore stockpiles, and seepage input to groundwater that flows into the open pits, as practical, and treat it, as necessary, before depositing it into the receiving environment during construction and operation of the Designated Project. The Proponent shall continue to collect all contact water, effluent, and seepage after operation, as necessary to comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act."
21	3.7	Key Issue	<i>When treating contact water, effluent and seepage, the Proponent shall take into account Manitoba's Water Quality Standards, Objectives, and Guidelines, Canadian Council of Ministers of the Environment's Canadian Water Quality</i>	The Proponent does not agree that contact water, effluent, and seepage need to be compared with Health Canada's Guidelines for Canadian Drinking Water Quality. There are no groundwater drinking	Please revise to "When treating contact water, effluent and seepage, the Proponent shall take into account Manitoba's Water Quality Standards, Objectives, and Guidelines, Canadian Council of Ministers of the

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			<i>Guidelines for the Protection of Aquatic Life, Health Canada's Guidelines for Canadian Drinking Water Quality, and Environment and Climate Change Canada's Federal Environmental Quality Guidelines.</i>	water receptors within the PDAs or LAAs of the Project. The receptor of groundwater seepage is surface water.	<i>Environment's Canadian Water Quality Guidelines for the Protection of Aquatic Life, and Environment and Climate Change Canada's Federal Environmental Quality Guidelines."</i>
22	3.8.2	Showstopper	<i>...conduct activities in or near fish-bearing water bodies, including blasting, outside of restricted activity timing windows for fish species in accordance with Fisheries and Oceans Canada's Manitoba Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat and within blasting thresholds recommended by Fisheries and Oceans Canada</i>	<p>The Proponent cannot commit to this condition. There are spring, summer, fall, and winter spawning fish species present in the Keewatin River near the MacLellan site and spring, summer, and winter spawning fish species present in Farley Lake near the Gordon site. Therefore, a reduced risk window to avoid potential blasting effects during the spawning periods would be too short for the Project to proceed.</p> <p>Alamos cannot commit to following the blasting thresholds recommended by DFO in its "Guidelines for Use of Explosives In or Near Canadian Fisheries Waters" or the more recent recommendation in Cott and Hanna (2005). This is because the 50 kPa and 100 kPa thresholds would prevent mining in the upper pit shells given the relatively short distances between the pits and fish-bearing lakes at the Gordon site and fish-bearing river at the MacLellan site. However, Alamos is committed to working with DFO to agree on technically feasible mitigation methods to reduce mortalities and injuries to fish in the river and lakes near the open pits. These include but are not limited to optimizing the blast design to reduce sound pressures and peak particle velocities; fish exclusion areas closest to open pits; bubble curtains.</p>	<p>Please revise to: "...work with Fisheries and Oceans Canada to develop mitigation measures to reduce potential effects of blasting on fish and a monitoring program to assess the effectiveness of the mitigation measures to reduce sound pressures and peak particle velocities."</p>
23	3.8.3	Deviation/ Recommendation	<i>...maintain during all phases a buffer of undisturbed vegetation of at least 30 meters from the water line along water frequented by fish, including wetlands.</i>	<p>This condition deviates from the EA report. Wetlands within the PDA cannot be avoided. Suggest revision to replace "water line" with "high-water mark" as "high-water mark" is a term used in federal and provincial guidance documents.</p>	<p>Please revise to "A 30-metre buffer will be established around wetlands adjacent to the PDA prior to work to limit disturbance and maintain existing vegetation. When work near wetlands adjacent to the PDA is required, existing access routes will be planned to maintain during all phases a buffer of undisturbed vegetation of at least 30 meters from the high-water mark along water frequented by fish, including wetlands. Further, weight-distributing</p>

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					<i>materials will be used under machinery to limit soil compaction in areas where excavation is not planned.”</i>
24	3.9	Recommendation	<i>The Proponent shall consult with Indigenous groups, prior to the salvage and relocation of fish conducted pursuant to condition 3.8.1, to identify opportunities and determine their interest in participating in the salvage and relocation of fish.</i>	Replace Indigenous groups with local Indigenous Nations.	Please revise to <i>“The Proponent shall engage with local Indigenous Nations, prior to the salvage and relocation of fish conducted pursuant to condition 3.8.1, to identify opportunities and determine their interest in participating in the salvage and relocation of fish.”</i>
25	3.10.4	Deviation/ Showstopper	<i>...cover all acid-generating, potentially acid-generating, and potentially metal-leaching tailings and waste, including waste in the tailings management facility and mine rock storage areas, during operations, and decommissioning with an oxygen-limiting barrier in manner determined by a qualified individual; and...</i>	<p>The EIS advised that “Potentially acid-generating and non-potentially acid-generating mine rock in the mine rock storage areas would be blended during operation and mine rock would be encapsulated with overburden and soil at closure to limit acid rock drainage and metal leaching. Soil covers would be placed over the Tailings Management Facility during decommissioning/closure to limit the infiltration of precipitation and ingress of oxygen, to mitigate the risk of acid rock drainage and metal leaching in the Tailings Management Facility.”</p> <p>The EA report indicated “Development of acid rock drainage and metal leaching will be limited during all project phases, and waste, including waste rock within the Tailings Management Facility, will be covered during decommissioning/closure in a manner determined by a qualified individual.”</p> <p>Neither the EIS, nor the EA report, mentioned or committed to a cover during Project operation. It is not technically or economically feasible to cover materials during operation, nor is it necessary based on the predicted timeline(s) for acid-generation with respect to the timeline of the Project.</p>	Please revise to “...decommission all acid-generating, potentially acid-generating, and potentially metal-leaching tailings and waste, including waste in the tailings management facility and mine rock storage areas, with an oxygen-limiting barrier in manner determined by a qualified individual; and...”

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26	3.10.5	Showstopper	<i>...only use materials that are not acid-generating, potentially acid-generating or metal leaching during construction, including for earthworks and grading.</i>	<p>This condition is not clear. Alamos' understanding of used definitions:</p> <ul style="list-style-type: none"> not acid-generating – not currently generating acid leachate non-potentially acid-generating – is not expected to generate acid in future <p>Construction materials are considered potentially acid generating (PAG) if sulphur content is above 0.11% and NPR is below 2. Only non-PAG mine rock, including that produced from the open pits, will be used for construction of pads, roads, and building foundations above the water table. Overburden and ex-pit rock identified as PAG will be excluded from construction and transported to the MRSA unless PAG materials are covered with water or materials reducing infiltration and oxygen ingress.</p>	<p>Please revise to “...only use materials that are not acid-generating, <u>non</u>-potentially acid-generating or metal leaching during construction, including for earthworks and grading, unless water and oxygen infiltration and ingress are precluded.</p>
27	3.11	Recommendation	<i>The Proponent shall submit these measures to the Agency before implementing them.</i>	The Proponent is unclear of the intent of the submission of erosion and sediment control mitigation measures. Does the Agency review and approve, or is this just a 'notification' (i.e., sharing of information)?	Please revise to “ <i>The Proponent shall submit information relating to these measures to the Agency, as notification, before implementing them.</i> ”
28	3.11.2	Recommendation	<i>...effluent discharge pipes that are equipped with diffusers.</i>	The Proponent is still considering use of other effluent conveyance measures besides effluent pipes at some locations.	Please revise to “...effluent discharge pipes to include diffusers, where effluent pipes are used.”
29	3.12.3	Key Issue	<i>...monitor, beginning during construction, water quality in the East and Wendy pit lakes, tailings management facility sediment pond, and receiving waterbodies and watercourses upstream and downstream of the Project development areas, including downstream of the edge of mixing zones identified pursuant to condition 3.12.1, Arbor Lake, Burger 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 and Swede Lake, and fish-bearing wetlands identified pursuant to condition 3.12.2, for all parameters that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, copper, cyanide, fluoride, hexavalent chromium, iron,</i>	<p>This list of monitoring locations is incorrect (and there is no such location as “Burger Lake”; it is “Burge Lake”).</p> <p>In Alamos' opinion, this condition is too prescriptive. Alamos is currently developing a Surface Water Management and Monitoring Plan (SWMMP) and intends on submitting a draft of this plan to federal and provincial authorities, local Indigenous Nations, and the Environmental Advisory Committee prior to construction. The intent of providing a draft SWMMP is to foster discussion and coming to agreement on the study design, including “impact” and “reference” sites, sampling methods, the frequency and duration of sampling, laboratory detection limits, and parameter of concern upon which the trigger response thresholds and adaptive management plan will be based. As such, Alamos suggests making this condition more general.</p>	<p>Please revise to “...develop a Surface Water Management and Monitoring Plan, in consultation with federal and provincial authorities and through engagement with local Indigenous Nations, through the Environmental Advisory Committee, that defines the study design, sample sites, methods, frequency and duration of sampling, and parameters of concern for which trigger thresholds and an adaptive management plan that will be developed prior to construction of the Project.”</p>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
			<p><i>methylmercury, phosphorus, and total and dissolved cadmium, calcium and magnesium. Monitoring of the East and Wendy pit lakes shall continue through post-closure until water quality meets the Canadian Council of Minister of the Environment's Canadian Water Quality Guidelines for Protection for Aquatic Life pursuant to condition 3.7, and is stable or improving;</i></p>		
30	3.12.4	Recommendation	<p><i>...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, Susan Lake, and fish-bearing wetlands identified pursuant to condition 3.12.2 within the Project development areas, up and down gradient from the tailings management facility, mine rock storage areas, ore and overburden stockpiles, and seepage collection systems for all parameters 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 cyanide, iron, lead, nitrate, nitrite, sodium, sulphate at the MacLellan site;</i></p>	<p>Monitoring well placement should be along the groundwater flow path from the source to the predicted receiver to understand potential for seepage from the MRSA, TMF, and ore/overburden stockpiles. Groundwater monitoring wells will be strategically placed upgradient, cross gradient, downgradient of the MRSA, TMF, ore and overburden stockpiles to understand potential for at source seepage. Additional monitoring wells will be placed further downgradient of the source and adjacent to predicted receivers to measure groundwater quality and flow direction from the source to the potential receiver. The monitoring program will be developed in accordance with Condition 2.5 which includes consultation with IAAC.</p>	<p>Please revise to "...monitor in accordance with the follow-up program developed in condition 2.5 and beginning during construction, groundwater quality and levels upgradient, downgradient and cross gradient of the open pits tailings management facility, mine rock storage areas, ore and overburden stockpiles, and in wells located along the predicted flow paths of any seepage from these mine features."</p>
31	3.12.6	Key Issue	<p><i>...develop, in consultation with relevant authorities, and implement modified or additional mitigations, if results of monitoring pursuant to condition 3.12.3, 3.12.4 and 3.12.5 demonstrate any exceedances of the Canadian Council of Minister of the Environment's Canadian Water Quality Guidelines for Protection for Aquatic Life attributable to the Designated Project as identified in Volume 1 Chapter 9 of the Environmental Impact Statement.</i></p>	<p>The need for mitigation should be tied to the levels of environmental change relative to baseline that would require the Proponent to implement modified or additional mitigation measures(s) as defined in condition 2.5.4. In defining the levels of environmental change in condition 2.5.4, the Canadian Water Quality Guidelines for Protection of Aquatic Life and guidelines for groundwater quality that discharges to surface water that is protective of aquatic life will be considered. Condition 2.5.4 is to be completed in consultation and so IAAC will review the follow up program and levels of environmental change relative to baseline that would require additional investigation/mitigation prior to implementation.</p>	<p>Please revise to "...develop an adaptive management plan, including modified or additional mitigation measures, that will be enacted if results of monitoring pursuant to conditions 3.12.3, 3.12.4 and 3.12.5 demonstrate any trigger action thresholds based on Canadian Council of Minister of the Environment's Canadian Water Quality Guidelines for Protection for Aquatic Life, Federal Environmental Quality Guidelines, or site-specific water quality objectives, or the levels of environmental change defined in condition 2.5.4 that is attributable to the Designated Project, as determined in consultation with</p>

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				<p>Alamos is concerned that this condition requires immediate implementation of additional or modified mitigation. Alamos is proposing a hierarchical adaptive management plan as part of its Surface Water Management and Monitoring Plan that will include a plan to investigate potential causes of trigger thresholds (including measurement error, equipment malfunction, regional phenomena), a reporting plan, and a hierarchical remedial action plan.</p> <p>Alamos is concerned that additional or modified mitigation measures based solely on comparison of surface water quality parameters to baseline and/or Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for the Project of Aquatic Life (CWQG-FALs) may lead to unwarranted actions, including shut-down of the Project. Alamos has collected more than 2 years of water quality data from lakes and streams in the LAAs. However, this is still insufficient from which to develop robust trigger thresholds (e.g., 90th percentiles) that would be truly protective of fish and aquatic biota. Also, many CWQG-FALs are out-of-date and do not represent the most up-to-date toxicological research. To rectify this, ECCC has been releasing Federal Environmental Quality Guidelines in lieu of updating of CWQG-FALs by the CCME. Therefore, Alamos is currently developing trigger thresholds based on the FEQGs or most current toxicological data for parameters with out-of-date CWQG-FALs. Also, Alamos is proposing site-specific water quality objectives for parameters where existing CWQG-FALs do not consider toxicity modifying factors (e.g., hardness, pH, dissolved organic carbon).</p>	<p><i>relevant authorities and through engagement with local Indigenous Nations."</i></p>
32	3.13.1	Key Issue	<p><i>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and any other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as they pertain to adverse environmental effects of the Designated Project on water quantity. The Proponent shall implement the follow-up program during all phases of</i></p>	<p>This list of monitoring locations is incorrect (and there is no such location as "Burger Lake"; it is "Burge Lake").</p> <p>In Alamos' opinion, this condition is too prescriptive. Alamos is currently developing a Surface Water Management and Monitoring Plan (SWMMP) and intends on submitting a draft of this plan to federal and provincial authorities, local Indigenous Nations, and the Environmental Advisory Committee prior to construction. The intent of providing a draft SWMMP is to foster discussion and coming to agreement on the study design, including "impact" and "reference" sites, sampling methods, the frequency and duration of</p>	<p>Please revise to "...develop a surface water quantity monitoring plan, in consultation with federal and provincial authorities and through engagement with local Indigenous Nations, through the Environmental Advisory Committee, which defines the study design, sample sites, methods, frequency and duration of sampling, trigger thresholds and an adaptive management plan that will be developed prior to construction of the Project."</p>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
			<i>the Designated Project. As part of the follow-up program, the Proponent shall: monitor, during all phases, surface water instantaneous flows, lake levels and pH levels within Arbor Lake, Burger Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Swede Lake, fish-bearing wetlands within the local assessment areas, the East and Wendy Pits and the tailings management facility collection pond to verify the environmental assessment predictions identified in Volume 2 Chapter 10 of the Environmental Impact Statement and Appendix A Attachment IAAC-48 of the Proponent's IR Response Round 1, Package 1</i>	sampling, laboratory detection limits, and parameter of concern upon which the trigger response thresholds and adaptive management plan will be based. As such, Alamos suggests making this condition more general.	
33	3.13.2	Showstopper	Monitor 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, from near surface to a minimum of 115 metres below ground near the open pits, the tailings management facility, mine rock storage areas, ore and overburden stockpiles, and fish-bearing wetlands within the local assessment areas	The requirement to characterize bedrock to 115 m below ground for fish-bearing wetlands within the local assessment areas is not feasible and is considered excessive. The aquatic local assessment area is much larger than the groundwater local assessment area and the groundwater flow model domain. Further, some of the fish-bearing wetlands are not located within the predicted flow path of seepage or drawdown effects associated with the Project. The need to characterize bedrock to 115 m should be focused on areas where mine infrastructure is located and where effects of the Project on groundwater are predicted.	Please revise to “Monitor 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, from near surface to a minimum of 115 metres below ground near the open pits, the tailings management facility, mine rock storage areas, ore and overburden stockpiles, within the Project development area.”
34	3.13.3	Key Issue	<i>Develop, in consultation with relevant authorities, and implement modified or additional mitigation measures, if the results of monitoring conducted pursuant to condition 3.13.1 and 3.13.2 demonstrates unanticipated effects attributable to the Designated Project</i>	The Proponent is concerned that this condition does not consider the hierarchical adaptive management approach that has been developed (as outlined in the Information Request responses) for monitoring and managing potential effects to surface water quantity or groundwater due to the Project.	Please revise to “Develop an adaptive management plan, including modified or additional mitigation measures, that will be enacted if results of monitoring pursuant to conditions 3.13.1 and 3.13.2 demonstrate any trigger action thresholds based on the levels of environmental change defined in condition 2.5.4 that is attributable to the Designated Project, as determined in consultation with relevant authorities

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Item	Condition	Rank	Excerpt	Comment	Suggestion
					<i>and through engagement with local Indigenous Nations.”</i>
35	3.14.1	Key Issue	<i>Monitor, during all phases of the Designated Project, water temperature 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 relevant authorities, taking into account predictions in Volume 2 Chapter 10 of the Environmental Impact Statement</i>	The Proponent agrees that monitoring water temperature in Gordon Lake, the diversion channel, Farley Lake, Minton Lake, and Farley Creek is prudent and has included this monitoring in the AEMP. However, Alamos does not agree that water temperature needs to be in the Keewatin River or the Hughes River. This is because the volume of heated or cooled effluent discharged to the Keewatin River is negligible in comparison to the volume of the Keewatin River downstream of the MacLellan site and because effluent will not be discharged to the Hughes River; effluent will be discharged to Gordon and Farley lakes, two headwater lakes at least 9 km upstream from the Hughes River.	Please revise to “ <i>Monitor, during all phases of the Designated Project, water temperature in Farley Creek, Farley Lake, Gordon Lake, Minton Lake, the new diversion channel, and any additional locations identified in consultation with relevant authorities, taking into account predictions in Volume 2 Chapter 10 of the Environmental Impact Statement.</i> ”
36	3.14.2	Key Issue	<i>...monitor benthic invertebrate, plankton and periphyton populations 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 relevant authorities, for the detection of project-related changes in nutrient and contaminant levels and food web dynamics as identified in Volume 2 Chapter 10 of the Environmental Impact Statement. Benthic invertebrate parameters to be monitored shall include total invertebrate density, taxon richness, Simpson’s Evenness Index, and Bray-Curtis Index;...</i>	The Proponent disagrees with inclusion of plankton and periphyton communities in the follow-up and monitoring program for the Project. Plankton and periphyton communities are highly variable, seasonally and spatially, and require years of baseline data collection to characterize this variability for identification of statistically significant differences “before” and “after” and/or between “impact” and “reference” sites. However, Alamos intends on including chlorophyll a concentration as a metric for monitoring potential change and benthic invertebrate community metrics. The Proponent is also concerned with inclusion of monitoring potential changes in “food web dynamics” as a condition of the Project’s license. Food web dynamics suggests monitoring all components of the aquatic environment in sufficient detail and intensity to understand how changes in water quality, water quantity, ice regime, etc., may affect the abundance, diversity, distribution of biotic communities at all trophic levels, and the energy transfer between these trophic levels as determined by inter-species competition, predatory-prey relationships, and habitat limitations. It is Alamos’ opinion that such a requirement is beyond what is required by provincial and federal regulators for other mining projects or required by federal or provincial technical effects monitoring guidance.	Please revise to “ <i>...monitor benthic invertebrates in Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, Minton Lake, the new diversion channel, and any additional locations identified in consultation with relevant authorities, for the detection of project-related changes in nutrient and contaminant levels as identified in Volume 2 Chapter 10 of the Environmental Impact Statement. Benthic invertebrate parameters to be monitored shall include total invertebrate density, taxon richness, Simpson’s Evenness Index, and Bray-Curtis Index;...</i> ”

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Item	Condition	Rank	Excerpt	Comment	Suggestion
				<p>Alamos is also concerned that such a requirement would be near impossible to detect any statistically significant differences in any “food web dynamic” metric(s) within the time frame of the Project if it was to be included as a requirement in the follow-up and monitoring program.</p> <p>The Proponent disagrees with inclusion of the benthic invertebrate monitoring program to the Hughes River. This is because the mine is located at least 9 km upstream of the Hughes River with two large lakes (Swede and Ellystan lakes) located between Farley Lake and the Hughes River.</p>	
37	3.14.3	Recommendation	<p><i>...identify, in consultation with Indigenous groups, Fisheries and Oceans Canada and any other relevant authorities, fish species to monitor, including species of cultural importance to Indigenous groups, and highly sensitive fish species. Species shall include lake sturgeon (Acipenser fulvescens), burbot (Lota lota), northern pike (Esox lucius), lake whitefish (Coregonus clupeaformis), and white sucker (Catostomus commersonii);</i></p>	<p>The Proponent is concerned that this condition is too prescriptive and pre-empts input from local Indigenous Nations and the Environmental Advisory Committee. A more general condition is requested.</p>	<p>Please revise to “...identify, through engagement with local Indigenous Nations, Fisheries and Oceans Canada and any other relevant authorities, fish species to monitor, including species of cultural importance to local Indigenous Nations, and highly sensitive fish species.”</p>
38	3.14.4	Key Issue	<p><i>...monitor, during all phases of the Designated Project, including prior to construction, for all species identified in condition 3.14.3, habitat availability, quality and utilization, growth, survival and reproduction, spawning success, juvenile recruitment, and genetic composition in Farley Lake, Gordon Lake, Farley Creek, Minton Lake, the Hughes River, the Keewatin River, the new diversion channel, fish-bearing wetlands within the Project development areas identified pursuant to condition 3.12.2, and any additional locations identified in consultation with relevant authorities.</i></p>	<p>The Proponent does not agree that fish population metrics (i.e., growth, survival, reproduction, spawning success, juvenile recruitment, and genetic composition) should be included in the follow-up and monitoring program. The natural variability of fish populations (e.g., abundance, age structure, growth and mortality rate) is high and large, multi-year data sets are required to characterize this natural variability so that statistically significant differences caused by the Project can be detected. These datasets are typically larger (i.e., up to 10 years) than the baseline data sets collected for mining projects in Canada. Instead, Alamos proposes to monitor habitat conditions used by and fish tissue concentrations in fish species of cultural importance to local Indigenous Nations. These metrics have less natural variability, are more easily measured, and therefore, are more likely to show statistically significant difference earlier and more definitively than the fish populations themselves.</p>	<p>Please revise to “...monitor, during all phases of the Designated Project, including prior to construction, for all species identified in condition 3.14.3, tissue metal concentrations in fish species of cultural importance to Indigenous Nations and/or appropriate sentinel fish species for detecting potential change in water quality or habitat quality downstream of the Project, as well as habitat availability and quality in Farley Lake, Gordon Lake, Farley Creek, Minton Lake, the Keewatin River, the new diversion channel, and fish-bearing wetlands within the Project development areas identified pursuant to condition 3.12.2, and any additional locations identified in consultation with relevant authorities.”</p>

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Section 4 – Migratory Birds

Item	Condition	Rank	Excerpt	Comment	Suggestion
39	4.5.1	Deviation	<p>...install deterrents near Designated Project infrastructure where contact water is stored or conveyed, including the tailings management facility and contact water collection ponds;</p>	<p>Deterrents should only be required where applicable and if other mitigation measures fail.</p> <p>The EA report states that: <i>If monitoring identifies use of these areas by migratory birds or bird species at risk, deterrents will be implemented until decommissioning of the Tailings Management Facility and contact water collection ponds is complete and monitoring indicates that water in the Tailings Management Facility and contact water collection ponds meets water quality objectives, to be established using an ecological risk-based approach developed in consultation with Indigenous nations and relevant federal and provincial authorities.</i></p> <p><i>To reduce the risk of mortality or adverse health effects to species at risk as a result of interactions with tailings and contact water, the Agency recommends that the Proponent implement deterrents, such as vegetation management, fencing, and netting, at all times during all project phases.</i></p> <p><i>Measures to deter use of the Tailings Management Facility, contact water collection ponds, and any other infrastructure where contact water may be stored or conveyed (see Chapter 7.2 (Migratory Birds) of the EA report) will also apply to northern leopard frog, little brown myotis, and northern myotis.</i></p>	<p>Revise to align to EA Report as follows: <i>"If monitoring identifies use of Project infrastructure where contact water is stored or conveyed, including the tailings management facility and contact water collection ponds by migratory birds or bird species at risk, deterrents will be implemented where applicable and if other mitigation measures fail."</i></p>

Section 5 – Current Use of Lands and Resources for Traditional Purposes

Item	Condition	Rank	Excerpt	Comment	Suggestion
40	5.1	Key Issue	<p><i>The Proponent shall provide access to Indigenous groups to or through the Project development areas, during all phases of the Designated Project, for harvesting and cultural purposes or for exercising Aboriginal rights, to the extent that such access and exercise of rights are safe.</i></p>	<p>The Proponent has made the following commitment: <i>Mitigation to changes in access to lands and resources currently used for traditional purposes through; timing of Project activities, potential scheduling of construction, signage, and engagement with Indigenous Nations to identify potential alternate routes of access. Alamos has stated that access to the PDA will be controlled.</i></p> <p>For safety reasons, permitting local Indigenous Nations access to the PDA may not be practical or feasible.</p>	<p>Please revise to <i>"The Proponent will engage local Indigenous Nations to address changes in access to lands and resources currently used for traditional purposes through timing of Project activities, potential scheduling of construction, signage, and identification of potential alternate routes of access, including portages, where required."</i></p>
41	5.2	Key Issue	<p><i>The Proponent shall avoid disturbing sites of traditional or cultural importance within or near the Project development areas, except for the construction of Designated Project</i></p>	<p>The Proponent has made the following commitment: <i>The Project footprint will be limited to the extent possible (i.e., PDA) including construction and operation and maintenance activities to reduce</i></p>	<p>Please revise to <i>"The Proponent shall take reasonable precautions to avoid disturbing sites of traditional..."</i></p>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
			<i>components. In doing so, the Proponent shall:</i>	<i>disturbances to adjacent productive forest land may not be possible to commit to avoid disturbing sites in all cases.</i> Suggest revising "shall avoid disturbing" to "shall take reasonable precautions to avoid disturbing"	
42	5.2.1	Recommendation	<i>...identify, in consultation with Indigenous groups, the location of sites of traditional or cultural importance within or near the Project development areas</i>	Please replace "consultation with Indigenous groups" with "engagement with local Indigenous Nations and through sharing information with the Environmental Advisory Committee."	Please revise to "...identify, through engagement with local Indigenous Nations and through sharing information with the Environmental Advisory Committee, the location of sites...."
43	5.2.2	Recommendation	<i>...provide opportunities to Indigenous groups, prior to construction and at times determined in consultation with each Indigenous group, to:</i>	Please revise terminology.	Please revise to "...provide opportunities to local Indigenous Nations, prior to construction and at times determined through engagement with local Indigenous Nations and through sharing information with the Environmental Advisory Committee..."
44	5.2.2.2	Key Issue	<i>conduct ceremonies for any sites of significance that will be disturbed by any Designated Project activities.</i>	As currently written, this requirement is considered unreasonable.	Please revise to: "The Proponent will work with local Indigenous Nations participating in the Environmental Advisory Committee to identify interest in conducting a ceremony(ies) prior to construction".
45	5.3	Key Issue	<i>The Proponent shall, during all phases of the Designated Project, prohibit Designated Project employees and contractors, from fishing and hunting within the Project development areas or using the Project development areas to access surrounding areas with the intent to fish or hunt, unless an employee or contractor is provided access by the Proponent for exercising Aboriginal rights.</i>	The Proponent has made the following commitments: <i>Work schedules will be implemented for Project construction workers (subject to fly-in/fly-out employment) to deter workers from hunting locally outside of working hours during a shift. Workers will be prohibited from bringing firearms and fishing gear to the sites while working to limit competition for wildlife and fish species of value to resource users.</i> Alamos cannot prohibit employees or contractors from hunting or fishing outside of working hours. As private citizens, employees and contractors have the right to go hunting and fishing, subject to provincial regulations.	Please revise to "To discourage employees and contractors from fishing and hunting outside of working hours, the Proponent will prohibit employees and contractors from bringing firearms and fishing gear to the sites while working."
46	5.5	Showstopper	<i>The Proponent shall identify statutory holidays and days of cultural importance in consultation with Indigenous groups. The proponent shall conduct blasting activities outside of the identified statutory holidays and days of cultural</i>	<i>It not technically or economically feasible to commit to no blasting on statutory holidays. Days of cultural importance are not defined in the regulatory record for this Project and may be interpreted to include events such as death of an Elder or other unpredictable community events</i>	<i>Please revise to: "The Proponent will inform local Indigenous Nations of blasting activities and monitoring results. The Proponent will develop protocols with local Indigenous Nations that would serve to inform</i>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
			<i>importance in order to mitigate the adverse effects of blasting on the current use of lands and resources for traditional purposes by Indigenous groups, unless required for safety reasons.</i>	that would be difficult for the Proponent to anticipate or schedule around.	<i>Indigenous land users of blasting or an anticipated blasting schedule ahead of time such that local receptors can prepare, and the resulting nuisance and startle responses are reduced."</i>

Section 6 – Health and Socio-economic Conditions of Indigenous Peoples

Item	Condition	Rank	Excerpt	Comment	Suggestion
47	6.1.2	Recommendation	<i>locate all stationary machinery and equipment used for processing ore indoors, where technically feasible, including the crushing plant and conveyors feeding into the ore milling and processing plant;</i>	Replace where technically feasible with "where technically and economically feasible"	Please revise to "...for processing ore indoors, where technically and economically feasible, including the..."
48	6.1.3	Showstopper	<i>...including Tier 4 emission standards for off-road equipment with off-road diesel engines, pursuant to the Off-Road Compression-Ignition (Mobile and Stationary) and Large Spark-Ignition Engine Emission Regulations and Off-Road Compression-Ignition Engine Emission Regulations;</i>	Tier 4 equipment is expected to be used during operation, but the majority of the construction off-road equipment will be rented and could include older equipment. Therefore, the Proponent cannot ensure that all equipment and vehicles used during all phases of the Project will meet Tier 4 emission standards. If required to meet Tier 4 emission standards then some potential suppliers, including Indigenous partners, would no longer be able to supply services during any Project phase.	Please revise to "including Tier 4 emission standards for the equipment used during the Project (except where presenting a barrier to local supplier/subcontractor involvement and/or Indigenous participation)."
49	6.2	Key Issue	<i>The Proponent shall implement measures, during all phases of the Designated Project, to ensure the thresholds for noise,...</i>	Replace the word "ensure"	Please revise to "The Proponent shall implement measures, during all phases of the Designated Project, designed to avoid exceedances of thresholds for noise,..."
50	6.3	Recommendation	<i>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)</i>	Please delete the word "Indigenous" to align with the Project Provincial Environment Act Licence (EAL) conditions.	Global Edit: please replace "Indigenous Environmental Advisory Committee" with "Environmental Advisory Committee" throughout the T&Cs.
51	6.3.3.2	Recommendation	<i>...including any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent as a result of each follow-up requirement;...</i>	Please revise to align with follow-up and monitoring programs.	Please revise to "...results of the follow-up and monitoring programs to be presented to the Environmental Advisory Committee in annual reports, which a summary of modified or additional mitigation measure implemented or proposed to be implemented by the Proponent;..."

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Item	Condition	Rank	Excerpt	Comment	Suggestion
52	6.4.1 6.4.2 6.4.3 6.4.4 6.4.5	Key Issue	<p><i>...identify, in consultation with Indigenous groups, the species of fish, vegetation and wildlife used as country foods and determine the locations where these species shall be monitored;</i></p> <p><i>monitor, beginning prior to construction and continuing through post-closure, contaminants of potential concern, including mercury, methylmercury, arsenic and copper, in species at locations identified in condition 6.4.1;</i></p> <p><i>monitor ambient air concentrations of TSP, PM10, PM2.5, NO2 and dustfall taking into account 24-hour and 1-hour thresholds of the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards during all project phases on Marcel Colomb First Nation's Black Sturgeon Reserve, and upwind and downwind from the Project development areas;</i></p> <p><i>monitor meteorological conditions (including wind speed, wind direction, temperature and relative humidity) upwind and downwind of the Project development areas, during construction and operation; and</i></p> <p><i>if the monitoring results referred to in conditions 6.4.2 and 6.4.3 exceed predicted levels in the Human Health Risk Assessment in Volume 5 Appendix H of the Environmental Impact Statement, and thresholds of the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards, respectively, modify or implement additional mitigation measures pursuant to condition 2.8 based on the results of the follow-up program and update the Human Health Risk Assessment in Volume 5 Appendix H of the Environmental Impact Statement.</i></p>	<p>The Proponent is concerned that these clauses are too prescriptive and pre-empt input from local Indigenous Nations and the Environmental Advisory Committee.</p>	<p>Please revise to a more general condition referencing the Management and Monitoring Plans (which will be reviewed by regulatory authorities, local Indigenous Nations, and the Environmental Advisory Committee prior to construction).</p>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
53	6.5	Key Issue	<i>The Proponent shall develop, in consultation with Indigenous groups, and implement a follow-up program related to the adverse environmental effects on the current use of lands and resources and socio-economic conditions caused by the Designated Project, including the quantity and quality of resources obtained through harvesting, fishing, hunting or trapping activities and the socio-economic impacts of those changes to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures implemented to address those effects. The Proponent shall implement the follow-up program during all phases of the Designated Project.</i>	As stated, this condition is open to various interpretations, and it is unclear how the Proponent will be able to demonstrate compliance. There is also the potential that this condition will duplicate work to be done under existing follow-up and monitoring programs (e.g., the Wildlife Management and Monitoring Plan and Aquatic Effects Monitoring Plan). The Proponent suggests revising this condition to bring under the Environmental Advisory Committee mandate.	Please revise to: <i>“The Proponent will review the results of the follow-up and monitoring programs for the Project with the Environmental Advisory Committee, and where participating engaged Indigenous Nations identify potential for adverse environmental effects on the current use of lands and resources and socio-economic conditions caused by the Designated Project, the Proponent shall at the request of participating engaged Indigenous Nations, develop a follow up program to specifically address the effects identified by local Indigenous Nations.”</i>
54	6.6.1	Deviation	<i>...monitor noise, including low frequency noise, and vibration levels at receptor locations within the Project development areas where effects to the health of Indigenous groups may occur as identified in Volume 1 Chapter 7 Tables 7-7, 7-8, 7-9 and 7-10 of the Environmental Impact Statement, including the permanent work camp, and permanent and seasonal residences.</i>	Receptor locations within the Project development areas include the permanent work camp; however, the seasonal residences are outside the Project development areas. Please replace permanent and seasonal residences with “sensitive receptors.” Note that based on information obtained through the Indigenous engagement program for the Project, Indigenous receptors were identified to evaluate noise and vibration effects at ten locations for Gordon site and 13 locations for MacLellan site. For consistency, it is suggested that the term ‘Indigenous receptors’ be used.	Please revise to <i>“...including the permanent work camp, and Indigenous receptors.”</i>

Section 7 – Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Significance

Item	Condition	Rank	Excerpt	Comment	Suggestion
55	7.1.3	Key Issue	<i>...inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in archaeological works;</i>	Heritage resources are regulated by the Province of Manitoba. The Proponent requests that the Agency identify the reporting mechanism for archaeological finds to the Agency.	Please revise to <i>“...inform the Agency (insert reporting mechanism) and local Indigenous Nations within 24 hours of the discovery and allow local Indigenous Nations to monitor and participate in archaeological works, ...”</i>

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Section 9 – Species at Risk

Item	Condition	Rank	Excerpt	Comment	Suggestion
56	9.1	Key Issue	<i>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 northern leopard frog (<i>Lithobates pipiens</i>) breeding timing and habitat, little brown myotis (<i>Myotis lucifugus</i>) and northern myotis (<i>Myotis septentrionalis</i>) maternal roosting sites and hibernacula sites, wolverine (<i>Gulo gulo</i>) denning habitat, and woodland caribou (<i>Rangifer tarandus caribou</i>) calving habitat and calf-rearing periods.</i>	The RAA overlaps with the northern extent of Northern leopard frog range however it has not been detected in the RAA in over a decade. It was concluded that this species would not be affected by the Project. Accordingly, please add, "as appropriate" after the words, "shall conduct".	Please revise to " <i>The Proponent shall conduct, as appropriate, prior to construction and through engagement with local Indigenous Nations and in consultation with relevant authorities, pre-construction surveys within the Project development areas to identify northern leopard frog (<i>Lithobates pipiens</i>) breeding timing and habitat, little brown myotis (<i>Myotis lucifugus</i>) and northern myotis (<i>Myotis septentrionalis</i>) maternal roosting sites and hibernacula sites, wolverine (<i>Gulo gulo</i>) denning habitat, and woodland caribou (<i>Rangifer tarandus caribou</i>) calving habitat and calf-rearing periods.</i> "
57	9.4.2	Recommendation	<i>...establish prior to construction and maintain, during construction and operation, buffer zones around active maternity roosts and hibernacula, taking into account British Columbia's Compendium of Wildlife Guidelines for Industrial Development Projects in the North Area, British Columbia.</i>	The Proponent suggests it follow more applicable guidelines. Manitoba does not have guidelines for bats. The typical default is to Saskatchewan guidelines, which are to be applied year-round to bat roosts and foraging sites.	Please revise to " <i>...establish prior to construction and maintain, during construction and operation, buffer zones around active maternity roosts and hibernacula, taking into account the Saskatchewan Ministry of Environment's Saskatchewan Activity Restriction Guidelines for Sensitive Species in the absence of Manitoba-specific guidelines.</i> "
58	9.5	Recommendation	<i>The Proponent shall, during all phases of the Designated Project in consultation with Indigenous groups, Environment and Climate Change Canada and any other relevant authorities, develop and implement measures to mitigate adverse effects from the Designated Project on woodland caribou (<i>Rangifer tarandus caribou</i>) and its habitat.</i>	Please add "within the Project Development Areas" as this is an important distinction.	Please revise to " <i>The Proponent shall, during all phases of the Designated Project through engagement with local Indigenous Nations, and in consultation with Environment and Climate Change Canada and any other relevant authorities, develop and implement measures to mitigate adverse effects from the Designated Project on woodland caribou (<i>Rangifer tarandus caribou</i>) and its habitat within the Project Development Areas.</i> "
59	9.5.3	Recommendation	<i>...as part of progressive reclamation in condition 5.7, removing and reclaiming all linear features, including the distribution line right of way and access roads, when</i>	This should consider whether government agencies or local Indigenous Nations want access.	Please revise to " <i>...as part of progressive reclamation in condition 5.7, removing and reclaiming all linear features, including the distribution line right of way and access roads, when</i>

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Item	Condition	Rank	Excerpt	Comment	Suggestion
			<i>they are no longer required for the Designated Project.</i>		<i>they are no longer required for the Designated Project or by local Indigenous Nations and/or government agencies."</i>
60	9.6	Recommendation	<i>The Proponent shall participate in regional initiatives related to the management of adverse impacts on woodland caribou (Rangifer tarandus caribou), from construction through the end of operations, at the request of the relevant authorities responsible for these initiatives. In doing so, the Proponent shall determine, in consultation with Indigenous groups and relevant authorities, how the Proponent shall participate.</i>	This condition should consider that requests be "reasonable".	Please revise to " <i>The Proponent shall participate in regional initiatives related to the management of adverse impacts on woodland caribou (Rangifer tarandus caribou), from construction through the end of operation, at the reasonable request of the relevant authorities responsible for these initiatives. In doing so, the Proponent shall determine, through engagement with local Indigenous Nations and in consultation with relevant authorities, how the Proponent shall participate.</i> "
61	9.6	Recommendation	<i>Regional initiatives shall include:...</i>	The Proponent requires some level of flexibility in the regional initiatives.	Please revise to " <i>...Regional initiatives could include:...</i> "

Section 10 – Independent Environmental Monitor

Item	Condition	Rank	Excerpt	Comment	Suggestion
62	10.1	Key Issue	<i>Independent Environmental Monitor</i>	The Proponent requests removal of this condition as it is covered by annual reporting, would be a duplication of efforts and the expected conditions of Impact Benefit Agreements with local Indigenous Nations.	Please remove this section.

Section 11 – Accidents and Malfunctions

Item	Condition	Rank	Excerpt	Comment	Suggestion
63	11.1	Key Issue	<i>The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects, including dam breaches, and mitigate them.</i>	Use of the term "all" with respect to reasonable measures is subjective and open to interpretation.	Please revise to " <i>The Proponent shall take reasonable measures to prevent...</i> "
64	11.6	Key Issue	<i>In the event of an accident or malfunction with the potential to cause adverse environmental effects, including an accident or a malfunction referred to in condition 11.4.1, the Proponent shall immediately implement the measures appropriate to remedy the accident or</i>	This requirement is not linked to legislation such as <i>Canadian Environmental Protection Act, 1999</i> or equivalent/similar provincial legislation. Accordingly, this clause potentially establishes a standard of care higher than is required by legislation.	Please revise to " <i>In the event of an accident or malfunction with the potential to cause adverse environmental effects and which triggers provincial and/or federal legislation, the Proponent shall implement...</i> "

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			<i>malfunction, including any measure referred to in condition 11.4.2, and shall:</i>		
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Section 12 – Schedules

Item	Condition	Rank	Excerpt	Comment	Suggestion
65	12.2	Key Issue	<i>The Proponent shall submit to the Agency and Indigenous groups a schedule outlining all activities required to carry out all phases of the Designated Project, including associated potential changes to air quality, noise, light and vibration, no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.</i>	It is not feasible to quantify the potential changes for each activity.	Please revise to “ <i>The Proponent shall submit to the Agency and local Indigenous Nations a schedule outlining all activities required to carry out all phases of the Designated Project, no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.</i> ”