

## Feedback on Project No. 80140 Alamos Gold Inc. Lynn Lake Gold Project (Gordon Site)

I am writing to provide comments on the Impact Assessment Agency of Canada's (IAAC) draft analysis of Alamos Gold Inc.'s proposed changes to the Lynn Lake Gold Project (Gordon Site).

While the draft analysis considers some of the potential environmental impacts associated with this proposed expansion, I am concerned that it does not meaningfully consider the shortcomings revealed by Wildfire NO002, or how those shortcomings will be addressed as the project expands beyond the footprint originally contemplated when the Decision Statement was issued.

Wildfire NO002 was a human-caused fire that resulted in widespread environmental damage, the destruction of homes and cabins, the evacuation of communities, and millions of dollars in public firefighting and emergency response costs. An event of this magnitude raises serious questions regarding the adequacy of prevention, mitigation, emergency response, risk management, and oversight. Yet the draft analysis does not propose any amendments to the existing Decision Statement to address these concerns or provide an explanation for why they are absent from the analysis.

Given the scale and consequences of Wildfire NO002, it would be reasonable to infer that the measures governing accidents and malfunctions, emergency response, monitoring, reporting, compliance, and follow-up in the original Decision Statement were inadequate or did not perform as intended. It would also be reasonable to expect, particularly where the proposed amendments are intended to facilitate further project expansion, that IAAC would indicate whether such a review was undertaken, and if so, what conclusions were reached and whether any amendments to the Decision Statement were necessary to reduce the likelihood or consequences of similar events in the future.

However, the draft analysis does not contemplate these things, and if any related findings, corrective actions, compliance measures, or follow-up requirements exist, they do not appear to be publicly available or to have resulted in any proposed amendments to the Decision Statement. Similarly, more than a year after the wildfire, the provincial government continues to assert that its wildfire investigation remains incomplete. As a result, the public is being asked, for the second time since the wildfire, to comment on further project expansion without access to information from a regulatory authority explaining what deficiencies in prevention, mitigation, response, risk management, and/or emergency preparedness led to a fire of the scale and consequences of Wildfire NO002. In the absence of publicly available findings to the contrary, it is difficult to understand how the existing provisions in the Decision Statement can be assumed to be sufficient.

The draft analysis concludes that the proposed changes are not likely to cause significant adverse environmental effects beyond those identified during the original environmental assessment. Yet the Project has already experienced a human-caused wildfire that

resulted in substantial environmental, social, and economic consequences despite the environmental assessment, mitigation measures, monitoring requirements, and legally binding conditions that were intended to prevent, mitigate, and respond to such events. Without any visible reassessment of those measures in light of Wildfire NO002, it is difficult to understand how IAAC determined that the current conditions remain sufficient and that no additional safeguards are required before approving further expansion of the Project.

From a public perspective, it is difficult to understand why an environmental incident of this magnitude has not resulted in a more comprehensive review of the project's safeguards and oversight framework before further expansion is considered.

Thank you  
Jeannine Kebernik