



Mathias Colomb Cree Nation

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Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, Ontario K1A 0H3

Submitted via the Canadian Impact Assessment Registry

RE: Comment on Proposed Amendment to the Decision Statement — Lynn Lake Gold Project (IAAC Project #80140) — Inclusion of the Burnt Timber and Linkwood Deposits

Dear Sir or Madam,

Mathias Colomb Cree Nation (“**MCCN**”) writes to provide formal comment on the above-noted proposed amendment to the Decision Statement for the Lynn Lake Gold Project (the “**Project**”), currently under review by the Impact Assessment Agency of Canada (the “**Agency**”). This submission is made within the comment period for this matter, which MCCN understands closes June 23, 2026.

MCCN is a signatory to an Impact Benefit Agreement (the “**IBA**”) with Alamos Gold Inc. (“**Alamos**”), dated March 5, 2025, in respect of the Lynn Lake Gold Project as it was then defined - comprising the MacLellan and Gordon mine sites. MCCN has supported, and continues to support, responsible mineral development within its Traditional Territory where that development proceeds in a manner consistent with the duty to consult, the principles of free, prior and informed consent under Article 32 of the United Nations Declaration on the Rights of Indigenous Peoples, and MCCN’s constitutionally protected rights under Section 35 of the Constitution Act, 1982.

MCCN's purpose in making this submission is not to oppose the proposed amendment outright, but to ensure that the Agency, and Alamos, are aware of MCCN's position regarding the scope of the existing IBA, the nature of MCCN's outstanding interests in the Burnt Timber and Linkwood deposits, and the conditions under which MCCN's continued cooperation and support can be assured.

1. MCCN's Rights and Interest in the Project Area

MCCN holds constitutionally protected Aboriginal and treaty rights within the Traditional Territory depicted in Schedule “A” to the IBA, which encompasses the area in which the Burnt Timber and Linkwood deposits are located. These rights exist independently of, and are not exhausted or extinguished by, the IBA. MCCN's support for the original Project at the MacLellan and Gordon sites was given based on the consultation, accommodation, and benefit-sharing terms specific to those sites, as negotiated and reflected in the IBA.

The Burnt Timber and Linkwood deposits represent a materially different proposition than the Project as originally assessed and approved. They involve new mine plans, new infrastructure, new environmental disturbance, and a substantial extension of the Project's operating life. MCCN's preliminary legal assessment is that the Burnt Timber and Linkwood deposits, and the activities required to bring them into production, fall outside the scope of the "Project Development Area" as defined in the IBA at the time of its execution, and that the existing IBA does not, on its current terms, provide for MCCN's economic participation in, or accommodation for, the impacts of these specific deposits.

MCCN therefore approaches the proposed Decision Statement amendment as a matter requiring fresh and adequate consultation, separate and apart from the consultation record associated with the original Project approval.

2. Adequacy of Consultation to Date

MCCN acknowledges Alamos's ongoing engagement with MCCN through the Implementation Committee and Environment Advisory Subcommittee established under the IBA. However, MCCN's preliminary view is that the consultation record specific to the Burnt Timber and Linkwood deposits - including their distinct environmental footprint, their cumulative effects when considered together with the existing MacLellan and Gordon operations, and their implications for MCCN's exercise of Rights including hunting, trapping, fishing, and cultural and spiritual practices - has not yet reached a level that MCCN considers adequate to support a finding that MCCN has been fully consulted and accommodated in respect of these specific deposits.

MCCN requests that the Agency take this submission into account in its assessment of whether consultation obligations owed to MCCN in respect of the proposed amendment have been satisfied and respectfully requests confirmation from the Agency as to how MCCN's comments on this matter will be addressed prior to any decision being rendered.

3. MCCN's Conditions for Continued Support

MCCN remains willing to support the responsible inclusion of the Burnt Timber and Linkwood deposits within the Project, recognizing the potential for continued economic benefit to MCCN and the broader region. MCCN's support for this amendment, however, is conditional upon the following:

1. Confirmation, through good-faith engagement between MCCN and Alamos, of an appropriate amendment to the existing IBA, or a new agreement, that extends economic participation, employment and training commitments, business and contracting opportunities, and environmental oversight mechanisms equivalent in principle to those already established for the MacLellan and Gordon sites, to the Burnt Timber and Linkwood deposits;
2. A full and fair opportunity for MCCN to review and comment on the environmental assessment materials specific to the Burnt Timber and Linkwood deposits, including their cumulative effects

in combination with existing Project operations, consistent with the engagement process MCCN understands to be contemplated under the existing Environmental Assessment Process; and

3. Recognition by the Agency and by Alamos that MCCN's participation in this regulatory process, and any cooperation extended in respect of the proposed amendment, is provided without prejudice to MCCN's position regarding the scope of the existing IBA and without waiver of any of MCCN's Rights, claims, or entitlements in respect of the Burnt Timber and Linkwood deposits.

MCCN is engaged in active and constructive discussions with Alamos regarding these matters and is hopeful that an appropriate resolution can be reached in the near term. MCCN's submission of this comment should not be interpreted as an indication that those discussions have broken down, but rather as a necessary step to preserve MCCN's position and ensure its interests are formally on the record within this regulatory process.

4. Specific Issues for the Agency's Consideration

In addition to the matters raised above, MCCN respectfully asks that the Agency turn its attention to the following specific issues in its review of the proposed amendment:

- Cumulative environmental effects of operating the Burnt Timber and Linkwood deposits concurrently with, or in sequence following, the existing MacLellan and Gordon operations, particularly with respect to water management, tailings storage, and impacts on fish-bearing waters relied upon by MCCN Members for traditional harvesting;
- The extended operating life of the Project that would result from incorporation of these deposits, and the corresponding extension of the period during which MCCN Members' exercise of Rights in the affected area will be restricted or impacted;
- Whether the environmental management and monitoring plans proposed for the Burnt Timber and Linkwood deposits adequately incorporate Traditional Knowledge, consistent with the approach MCCN and Alamos have sought to establish under the existing IBA; and
- The adequacy of closure and reclamation planning for the Burnt Timber and Linkwood sites, including financial assurance, given the additional disturbance these sites would introduce.

5. Conclusion

MCCN values its relationship with Alamos and recognizes the significant economic opportunity the Lynn Lake Gold Project, in its fullest extent, may represent for MCCN, its Members, and the broader Lynn Lake region. MCCN's intention in making this submission is to ensure that this opportunity is realized in a manner that respects MCCN's Rights, ensures adequate and ongoing consultation, and provides for fair and proportionate economic participation as the Project grows beyond its originally contemplated scope.

MCCN respectfully requests that the Agency:

1. Take this submission into account in its assessment of the proposed Decision Statement amendment;
2. Confirm to MCCN, in writing, how the matters raised in this submission will be addressed prior to any decision being issued; and
3. Provide MCCN a reasonable opportunity to be informed of, and respond to, any further material developments in this process prior to a final decision.

MCCN looks forward to the Agency's response and to the continued development of a respectful and mutually beneficial relationship with Alamos in respect of the Lynn Lake Gold Project. Should the Agency require any additional information or clarification regarding the matters raised in this submission, MCCN's Implementation Coordinator and legal counsel are available to assist.

Yours truly,

MATHIAS COLOMB CREE NATION

Chief Gordie Bear

Mathias Colomb Cree Nation

cc:

Implementation Committee, Mathias Colomb Cree Nation

Legal Counsel, Mathias Colomb Cree Nation

General Counsel, Alamos Gold Inc.