

Review of Alamos Gold Inc's Proposed Changes to the Lynn Lake Gold Project – Gordon Site

Manitoba Métis Federation

June 22, 2026



1.0 Introduction

The Impact Assessment Agency of Canada (IAAC) notified the Manitoba Métis Federation (MMF) – the National Government of the Red River Métis – about Alamos Gold Inc.’s proposed changes to the Gordon site of the Lynn Lake Gold Project (The Project). The Lynn Lake Gold Project is located within the National Homeland of the Red River Métis, in the MMF’s Thompson Region, and therefore has the potential to impact the exercise of Red River Métis s.35 rights, claims and interests. As such, IAAC has requested the MMF to provide comments on the Draft Analysis Report and the Recommended Amended Decision Statement that have been prepared by the IAAC.

2.0 Background—The Red River Métis and the MMF

The Red River Métis

The Red River Métis is an Indigenous collectivity and Aboriginal People within the meaning of section 35 of the *Constitution Act, 1982*.

Since 1982, Métis rights have been recognized and affirmed by section 35 and protected by section 25 of the *Constitution Act, 1982*. These rights were further confirmed and explained by the Supreme Court of Canada ("SCC") in *R. v. Powley*, 2003 SCC 43. Manitoba Courts also have recognized Red River Métis rights in *R. v. Goodon*, 2008 MBPC 59. These decisions have affirmed that the Métis hold existing Aboriginal rights throughout their traditional territories. Our Citizens and harvesters rely on and use the lands, waters, and resources of our traditional territory throughout the Province of Manitoba and elsewhere within the historic Northwest, to exercise the Red River Métis constitutionally protected rights and to maintain their distinct Red River Métis customs, traditions, and culture.

Red River Métis’ Rights, Claims, and Interests

Based on its emergence as a distinct Indigenous People in the Northwest prior to effective control by Canada and the creation of the province of Manitoba, the Red River Métis holds rights, claims, and interests throughout and beyond the Province of Manitoba consistent with the United Nations Declaration on the Rights of Indigenous Peoples, including the right of self-determination and the inherent right of self-government.

The Manitoba Métis Federation (MMF) – the National Government of the Red River Métis is mandated to promote, protect, and advance the collectively held Aboriginal rights of the Red River Métis. Through this mandate, the MMF engages with governments, industry, and others about potential impacts of projects and activities on the Red River Métis. In 2007, the MMF Annual



General Assembly adopted Resolution No. 8, which provides the framework for engagement, consultation, and accommodation with the Red River Métis. Designed by Red River Métis, for Red River Métis, Resolution No. 8 sets out the process that is to be followed by governments, industry, and other proponents when developing plans or projects that have the potential to impact the section 35 rights, claims, and interests of the Red River Métis. It was unanimously passed by Red River Métis Citizens and mandates a "single-window" approach to consultation and engagement with the Red River Métis through the MMF Home Office.^[1]

^[1] More information about Resolution No. 8 is available online at: <http://www.mmfmb.ca/docs/2013-Resolution%208%20Booklet-VFinal.pdf>

In engaging the MMF, on behalf of the Red River Métis, the Resolution No. 8 Framework calls for the implementation of five phases:

- Phase I: Notice and Response;
- Phase II: Research and Capacity;
- Phase III: Engagement and Consultation;
- Phase IV: Partnership and Accommodation; and
- Phase V: Implementation

This Project has the potential to impact Red River Métis rights, claims, and interests and as such, engagement and consultation with the MMF, through the process set out above, must be followed. The “postage stamp province” of Manitoba was the birthplace of the Red River Métis. We currently have an outstanding claim flowing from the Federal Crown's failure to diligently implement the land grant provision of 1.4 million acres of land promised to the Red River Métis as a condition of helping to bring Manitoba into Confederation. It is set out in section 31 of the *Manitoba Act, 1870* and must be resolved in accordance with the honour of the Crown.^[2]

Prior to the creation of Manitoba, the Red River Métis had always exercised its right of self-determination and developed its own self-government structures and institutions centered around the Red River Settlement and throughout the Northwest. As described by Louis Riel in his 1885 memoirs, Métis self-government was well-established and functioning when Canada came to the Red River Métis in the late 1800s:

When the Government of Canada presented itself at our doors it found us at peace. It found that the Métis people of the North-West could not only live well without it . . . but that it had a government of its own, free, peaceful, well-functioning, contributing to the work of civilization in a way that the Company from England could never have done without thousands of soldiers. It was a government with an organized constitution whose junction was more legitimate and worthy of respect, because it was exercised over a country that belonged to it.

Red River Métis self-government has evolved and changed over time to better meet the needs of the collectivity. Today, the MMF is the recognized, democratically elected, National Government of the Red River Métis. On November 30, 2024, the Red River Métis and Canada signed the Red



River Métis Self-Government Recognition and Implementation Treaty. The Treaty recognizes the MMF as the government of the Red River Métis.

Since 1967, the MMF has been authorized by the Red River Métis through a democratic governance structure at the Local, Regional, and National levels. As part of this governance structure, the MMF maintains a Registry of Red River Métis Citizens.^[3]

By applying for Red River Métis Citizenship, individuals are confirming the MMF is their chosen and elected representative government for the purposes clearly set out in the MMF Constitution,^[4] including as related to the collective rights, claims, and interests of the Red River Métis.^[5]

The MMF Constitution confirms that the MMF has been created to promote the political, social, cultural, and economic rights and interests of the Red River Métis. The MMF is authorized to represent the Red River Métis' collective rights, interests, and claims. This authorization is grounded in the MMF's democratic processes that ensures the MMF is responsible and accountable to the Red River Métis.

The MMF governance structure includes a centralized MMF President, Cabinet, Regions, and Locals. There are seven (7) Regions and approximately 135 Locals throughout Manitoba (Figure 1). There are thousands of Citizens who live outside of Manitoba. All Red River Métis Citizens are Members of a Local. Locals and Regions work together to authorize and support the MMF Cabinet, and the MMF's various departments and offices. Through elections held every four years, Citizens choose and elect the MMF Cabinet consisting of the MMF President, who is the leader and spokesperson for the MMF, a Vice-President of each Region, and two Regional Executive Officers from each Region. The MMF Cabinet also includes the spokeswoman for the Infinity Women Secretariat. Each Local's Membership elects a Chairperson, a Vice-Chairperson, a Secretary and a Treasurer (or a Secretary-Treasurer, as the case may be) to serve the Local for a four-year term.

Consistent with the direction of our Citizens back in 2014, the MMF removed the arbitrary provincial borders from our Constitution that separated Red River Métis who live outside of Manitoba from those within. Today, the MMF represents Red River Métis Citizens within the provincial borders of Manitoba, and thousands more across our National Homeland, and around the world.



The MMF, as the duly authorized government of the Red River Métis, has been recognized by both the federal and provincial governments in agreements, policies, and legislation. For example, in 2002, *The Child and Family Services Authorities Act* recognized the MMF for the devolution of child and family services to MMF institutions. This Act establishes a series of Child and Family Services Authorities to administer and provide the delivery of services to various distinct Indigenous communities in Manitoba. It creates a Métis Child and Family Services Authority, the directors of which are appointed by the MMF.

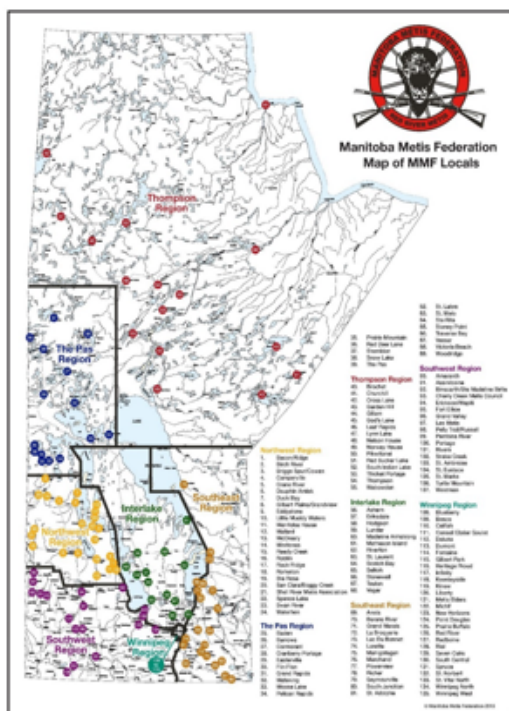


Figure 1. Manitoba Métis Federation (MMF) Regions.

In 2008, the courts in Manitoba further recognized that "[t]he Métis community today in Manitoba is a well-organized and vibrant community. Evidence was presented that the governing body of Métis people in Manitoba, the Manitoba Métis Federation, has a membership of approximately 40,000, most of which reside in southwestern Manitoba."^[6] In 2010, the Manitoba Government adopted a Manitoba Métis Policy, and stated that:

The Manitoba Métis Federation is a political representative of Métis people in Manitoba and represents in Manitoba the Métis who collectively refer to themselves as the Métis Nation. ...

Recognition of the Manitoba Métis Federation as the primary representative of the Métis people is an important part of formalizing relationships.^[7]

In 2012, the *MMF-Manitoba Harvesting Agreement (2012)* negotiated between the MMF, and the Manitoba Government recognized some of the collective section 35 harvesting rights of the Red River Métis and relied on the Citizenship processes of the MMF as proof of belonging to a rights-holding Indigenous collectivity:

For the purposes of these Points of Agreement, Manitoba will recognize as Métis Rights-Holders, individuals who are residents in Manitoba and who hold a valid MMF Harvesters Card, issued according to the MMF's Laws of the Hunt. [. . . and will] consult with the MMF prior to implementing any changes to the current regulatory regime that may infringe Métis Harvesting Rights.^[8]

In 2013, the SCC recognized the "collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada." It went on to grant the MMF standing as the "body representing the collective Métis interest" in the *MMF Case*.^[9] Additionally, in 2016, the *MMF-Canada Framework Agreement* stated:



the Supreme Court of Canada recognized that the claim of the Manitoba Métis Community was "not a series of claims for individual relief" but a "collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada" and went on to grant the MMF standing by concluding "[t]his collective claim merits allowing the body representing the collective Métis interest to come before the court". [and that] "Canada is committed to working, on a nation-to-nation, government-to-government basis, with the Métis Nation, through bilateral negotiations with the MMF. "^[10]

The MMF signed the *Manitoba Métis Self-Government Recognition and Implementation Agreement* (MMSGRIA) on July 6, 2021. This marked a major step forward in reconciliation between the Red River Métis and Canada. The MMSGRIA, among other things, immediately recognized the MMF as the National Government of the Red River Métis and sets out a path forward towards the completion of a modern Treaty. As noted above, that Treaty was signed on November 30, 2024. Once Implementation Legislation is in place, the Treaty will become fully effective and will have constitutional protection, further strengthening the relationship between the Red River Métis and Canada.

^[2] *Manitoba Métis Federation Inc. v. Canada (Attorney General)*, 2013 SCC 14, [2013] 1 SCR 623 ("MMF Case"). The Supreme Court of Canada recognized that this outstanding promise represents "a constitutional grievance going back almost a century and a half. So long as the issue remains outstanding, the goal of reconciliation and constitutional harmony, recognized in s. 35 of the *Constitution Act*, 1982 and underlying s. 31 of the *Manitoba Act*, remains unachieved. The ongoing rift in the national fabric that s. 31 was adopted to cure remains unremedied. The unfinished business of reconciliation of the Métis people with Canadian sovereignty is a matter of national and constitutional import" (para. 140).

^[3] MMF Constitution, Article III outlines the citizenship definition and application process. This definition ("Métis" is defined to mean "a person who self-identifies as Métis, is of historic Métis Nation Ancestry, is distinct from other Aboriginal Peoples and is accepted by the Métis Nation") aligns with the definition of what constitutes a section 35 rights-bearing Métis community as outlined by the Supreme Court of Canada in *Powley* at para. 30.

^[4] *Newfoundland and Labrador v. Labrador Métis Nation*, 2007 NLCA 75 at para 47: "Anyone becoming a member of the [Labrador Métis Nation] should be deemed to know they were authorizing the LMN to deal on their behalf to pursue the objects of the LMN, including those set out in the preamble to its articles of association. This is sufficient authorization to entitle the LMN to bring the suit to enforce the duty to consult in the present case."

^[5] *Behn v. Moulton Contracting Ltd.*, 2013 SCC 26 at para 30: "[A]n Aboriginal group can authorize an individual or an organization to represent it for the purpose of asserting its s.35 rights."

^[6] *R. v. Goodon*, 2008 MBPC 59 para 52. Note that the number of MMF Citizens (40,000) identified by the Court was as of 2007. .



[7] Manitoba Métis Policy, September 2010 at 4, 12, online (PDF): http://www.gov.mb.ca/imr/ir/major-initiatives/pubs/Métispolicy_en.pdf

[8] MMF-Manitoba Harvesting Points of Agreement (September 29, 2012), ss. 3, 6-7.

[9] *MMF Case*, *supra* note 6 at para 44.

[10] MMF-Canada Framework Agreement on Advancing Reconciliation, November 15, 2016, Preamble.

3.0 MMF Feedback

3.1 MMF Feedback on IAAC's Drafted Analysis Report

The following section contains the MMF's feedback on IAAC's "Draft Analysis of Proposed Changes to the Lynn Lake Gold Project – Gordon Site."

The MMF acknowledges IAAC's review of the proposed amendments and the technical comments provided by federal departments, including Environment and Climate Change Canada (ECCC), Fisheries and Oceans Canada (DFO), Health Canada, and Natural Resources Canada. The MMF also recognizes that several concerns identified during the review process have been incorporated into the proposed amendments to the Decision Statement, particularly with respect to additional water quality monitoring requirements and the inclusion of nitrate, nitrite, and ammonia as contaminants of concern.

The MMF is in agreement with the recommendation to include these additional contaminants within the surface water quality follow-up program. Water quality remains one of the primary concerns raised by Red River Métis Citizens in relation to mining developments. Citizens continue to harvest fish throughout the Lynn Lake region, and maintaining healthy aquatic ecosystems is important to the exercise of Red River Métis harvesting rights and traditional practices.

ECCC identified uncertainties regarding groundwater movement and contaminant transport pathways, particularly between historical mine rock storage areas, groundwater systems, and Farley Lake. The MMF shares these concerns and suggests a precautionary approach where there are uncertainties. While the Draft Analysis Report concludes that significant adverse effects are not expected, the conclusions rely heavily on future monitoring, follow-up programs, and adaptive management measures to verify predictions and respond to unanticipated effects. The



MMF expects that continued oversight and transparent reporting will be conducted throughout the life of the Project.

The MMF also notes that the Draft Analysis Report identifies increases in total mined tonnage, expansion of the Gordon open pit, and an increase in the overall Project disturbance area. While these changes are not expected to alter the significance of environmental effects previously assessed, they represent a continued expansion of Project activities. Red River Métis Citizens actively use the lands and waters surrounding Lynn Lake for fishing, hunting, trapping, gathering, and other traditional activities as indicated on the maps shared in (Figure 1, Figure 2, Figure 3, Figure 4). As the Project footprint and duration continue to increase, the importance of understanding the cumulative implications of these changes on traditional land use and harvesting opportunities increases as well.

The MMF further notes that Health Canada identified residual effects on air quality and country foods that are expected to increase, although remaining within previously assessed thresholds. The MMF expects the continued monitoring of fish, wildlife, vegetation, and other country foods used by Red River Métis. These resources are important to Red River Métis Citizens, and continued monitoring is necessary to maintain confidence in the safety and quality of traditionally harvested foods.

The Lynn Lake Gold Project has undergone several amendments since the original project approval, including amendments related to pit dewatering, the MacLellan Site and now the Gordon Site. While each amendment has been assessed individually, the MMF remains concerned about the cumulative effects associated with the ongoing expansion of Project activities over time. The MMF encourages IAAC to continue considering the cumulative implications of project modifications on water quality, fish and fish habitat, country foods, current use of lands and resources for traditional purposes, and the exercise of Red River Métis Section 35 rights.

The MMF expects continued engagement throughout the implementation of the Project and expects that commitments related to Red River Métis participation, monitoring, information sharing, and adaptive management will be fully implemented throughout all phases of the Project.

3.2 MMF Feedback on IAAC's Proposed Amendments to the Decision Statement

The following section contains the MMF's feedback on IAAC's proposed amendments to the Decision Statement for the Lynn Lake Gold Project.



The MMF generally agrees with the amendments proposed by IAAC, including the addition of nitrate, nitrite, and ammonia to the list of contaminants monitored through the surface water quality follow-up program and the updates to the Project Description and Project Development Area to reflect the proposed changes at the Gordon Site.

The MMF notes that the proposed amendments continue to rely on the existing framework of monitoring, follow-up programs, and adaptive management measures established under the Decision Statement.

The MMF recognizes that the Decision Statement contains extensive requirements related to water quality, water quantity, fish and fish habitat, country foods, Indigenous health, current use of lands and resources for traditional purposes, and Indigenous participation in follow-up programs. Conditions requiring consultation with Indigenous groups, sharing of monitoring results, opportunities to participate in monitoring activities, and implementation of additional mitigation measures where unanticipated effects are identified are important components of the regulatory framework for the Project. However, the MMF remains very concerned about the lack of meaningful engagement from Alamos Gold. The MMF expects IAAC to ensure these requirements are fully implemented and enforced throughout all phases of the Project.

The MMF agrees with the requirements for groundwater and surface water monitoring, including monitoring near Farley Lake, Gordon Lake, the Keewatin River, Minton Lake, Payne Lake, and other waterbodies that may be affected by Project activities. Given the concerns identified by Environment and Climate Change Canada regarding groundwater movement and contaminant transport pathways, the MMF expects that monitoring programs will be sufficiently robust to identify any unanticipated effects. The MMF further expects that monitoring results, adaptive management measures, and any proposed mitigation responses will be shared in a timely manner and that the MMF will be provided meaningful opportunities to participate in the development and implementation of these programs.

The MMF acknowledges that the proposed changes are accompanied by extensive monitoring commitments under the existing Decision Statement, including monitoring of surface water quality, groundwater quality, water quantity, fish and fish habitat, country foods, and Indigenous health indicators. The MMF supports the requirement that monitoring results be provided to Indigenous groups and that Indigenous Nations be afforded opportunities to participate in environmental monitoring, follow-up programs, and the review and interpretation of results. Red River Métis Citizens possess valuable knowledge of the lands, waters, fish, wildlife, and environmental conditions in the region and can contribute meaningfully to the identification of project-related effects and the development of appropriate mitigation measures.

The MMF further notes the importance of conditions related to country foods monitoring and Indigenous health. The Decision Statement requires monitoring of contaminants in fish,



vegetation, and wildlife consumed by Indigenous Peoples throughout the life of the Project and into post-closure. The MMF agrees with these requirements and expects monitoring information to be shared in a timely and accessible manner so that the MMF can understand whether Project activities are affecting resources used by the Red River Métis.

Finally, the MMF notes that the Decision Statement contains numerous requirements related to consultation with Indigenous groups, including participation in follow-up programs, development of mitigation measures, current use monitoring, cultural heritage protection, and the Indigenous Environmental Advisory Committee. So far, the MMF has not seen this occur with the proponent. The MMF expects these requirements to be implemented in a manner that provides meaningful opportunities for participation by the Red River Métis and reflects the Nation-to-Nation and Government-to-Government relationship between the MMF and the Crown. Meaningful engagement requires more than notification and information sharing; it requires adequate opportunities for MMF to review information, provide input, and influence decisions related to Project monitoring, mitigation, and adaptive management.

In closing, the MMF encourages IAAC to ensure that all existing conditions, particularly those related to Indigenous participation, monitoring, transparency, and adaptive management, are fully implemented and enforced throughout the life of the Project.

3.3 Red River Métis Land Use and Occupancy Catalogue Review

Since 2003, the MMF has collected and documented land use and occupancy information from Red River Métis Citizens across the National Homeland of the Red River Métis. This information is stored in the Red River Métis Land Use and Occupancy Catalogue (the Catalogue). The Catalogue is a database of locations where Red River Métis Citizens practice traditional harvesting activities, considered as Aboriginal rights as identified in and protected under section 35 of the *Constitution Act, 1982* and areas that are culturally and historically significant to the Red River Métis.

This Catalogue has over 22,500 features and represents data collected from over 400 interviews with individual Red River Métis Citizens. The MMF uses the Catalogue to guide discussions of impact, either cumulative or direct, from resource development projects. It is important to note that the MMF's studies that contribute to the Catalogue are generally project-specific and include interviews with Red River Métis Citizens who frequently use or have knowledge of the lands and waters in a specific geographic area. Given this, an absence of data in an area does not indicate an absence of Red River Métis land use and occupancy.



This report used the Catalogue to identify areas of importance or Red River Métis values that overlap with the proposed changes to Alamos Gold Inc.'s Lynn Lake Gold Mine - Gordon site, approximately 55 kilometres east of the town of Lynn Lake, Manitoba. Alamos Gold Inc. has made a submission to the Impact Assessment Agency of Canada regarding the following proposed changes at the Gordon site:

- An updated mine plan and site layout based on detailed engineering;
- An approximate 12% increase in mined tonnage and expanded open pit footprint;
- Adjustments to infrastructure and Project Development Area with an approximate 8.2% increase;
- Removal of the planned diversion channel between Gordon and Farley lakes; and
- Replacement of Arbor Lake with Carr Lake for monitoring

This area, located within the National Homeland of the Red River Métis, holds deep cultural, historical, and ecological significance. To capture a more complete understanding of land use and occupancy which may intersect with or occur adjacent to the potential changes at the Gordon site, researchers delineated a study area with a radius of 5 km around the identified Project Development Area (Figure 1).



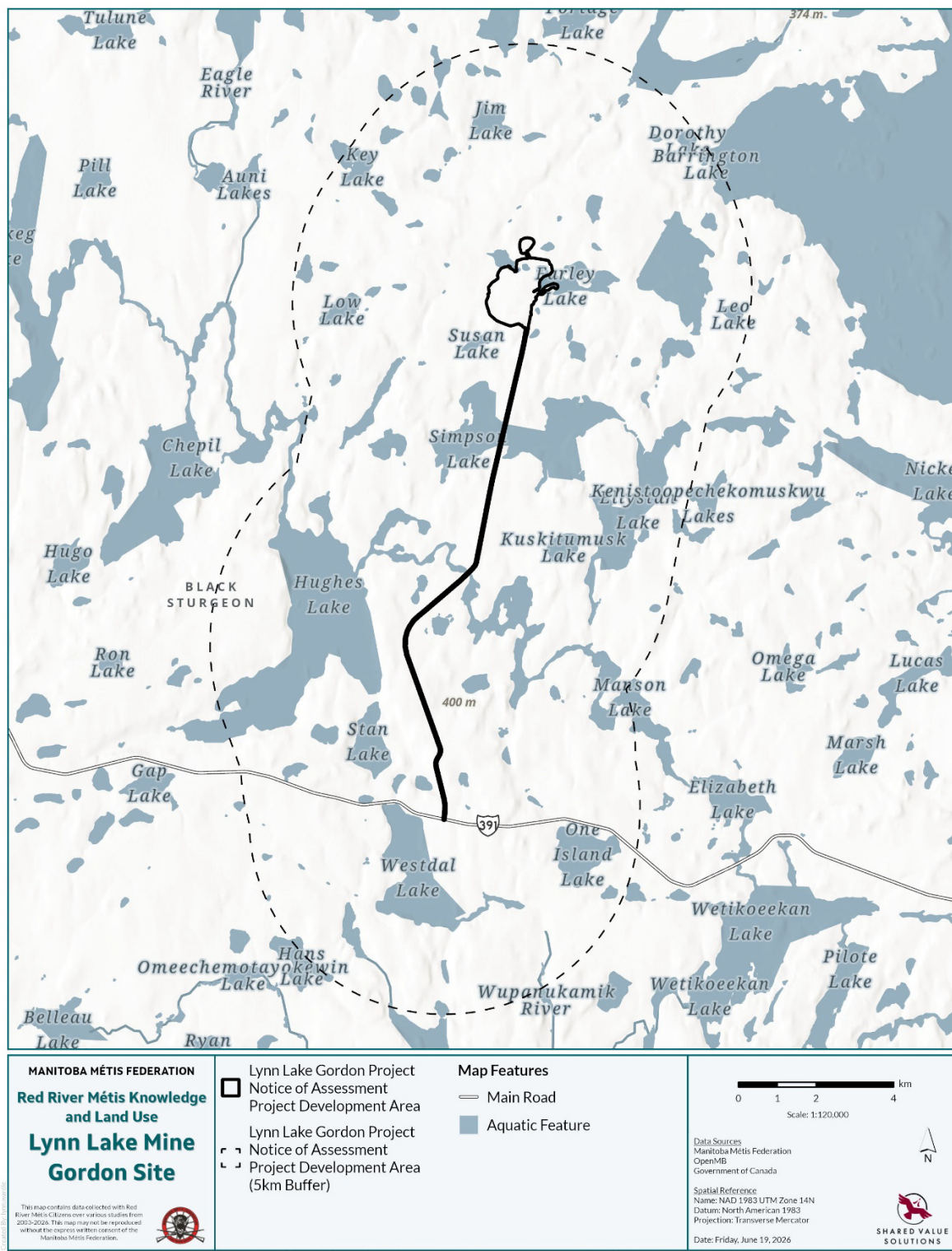


Figure 1: Lynn Lake - Gordon Site Project Development Area



3.3.1 Lynn Lake Gold – Gordon Site Project Area Catalogue Review

The Catalogue shows Red River Métis land use and occupancy data directly overlapping with the identified Gordon site of the Lynn Lake Gold Mine Project and within a 5-km buffer of the site and access road (Figure 2, Figure 3, Figure 4). These include:

- Access Routes and Trails
- Camps and Shelters: cabin
- Cultural Site
 - Burial site
- Sites of Red River Métis Ecological Knowledge
 - Bird habitat: spruce grouse
 - Fish habitat: fish spawning areas
 - Mammal habitat: lynx, fox, marten, otter, fisher, rabbit, weasel, squirrel, beaver, muskrat, mink
 - Plant habitat: blueberries
- Subsistence harvesting sites
 - Fishing: pickerel/walleye, lake whitefish, northern pike
 - Trapping and snaring
 - Gathering: mossberries, cranberries, raspberries, blueberries, Labrador tea, medicines, wood/trees
 - Hunting: moose, caribou, duck, goose

The features directly overlapping with the Gordon site include sites where Red River Métis Citizens hunt, fish, trap, and gather plants (berries, medicines, wood and trees). Red River Métis Ecological Knowledge features overlapping the Gordon site include mammal habitat (lynx, fox, marten, otter, fisher, rabbit, weasel, squirrel, beaver, muskrat, mink), and bird habitat (spruce grouse).

It is important to note that while the Catalogue provides valuable insight into Red River Métis knowledge, land use, and occupancy in the area it does not provide a comprehensive record.



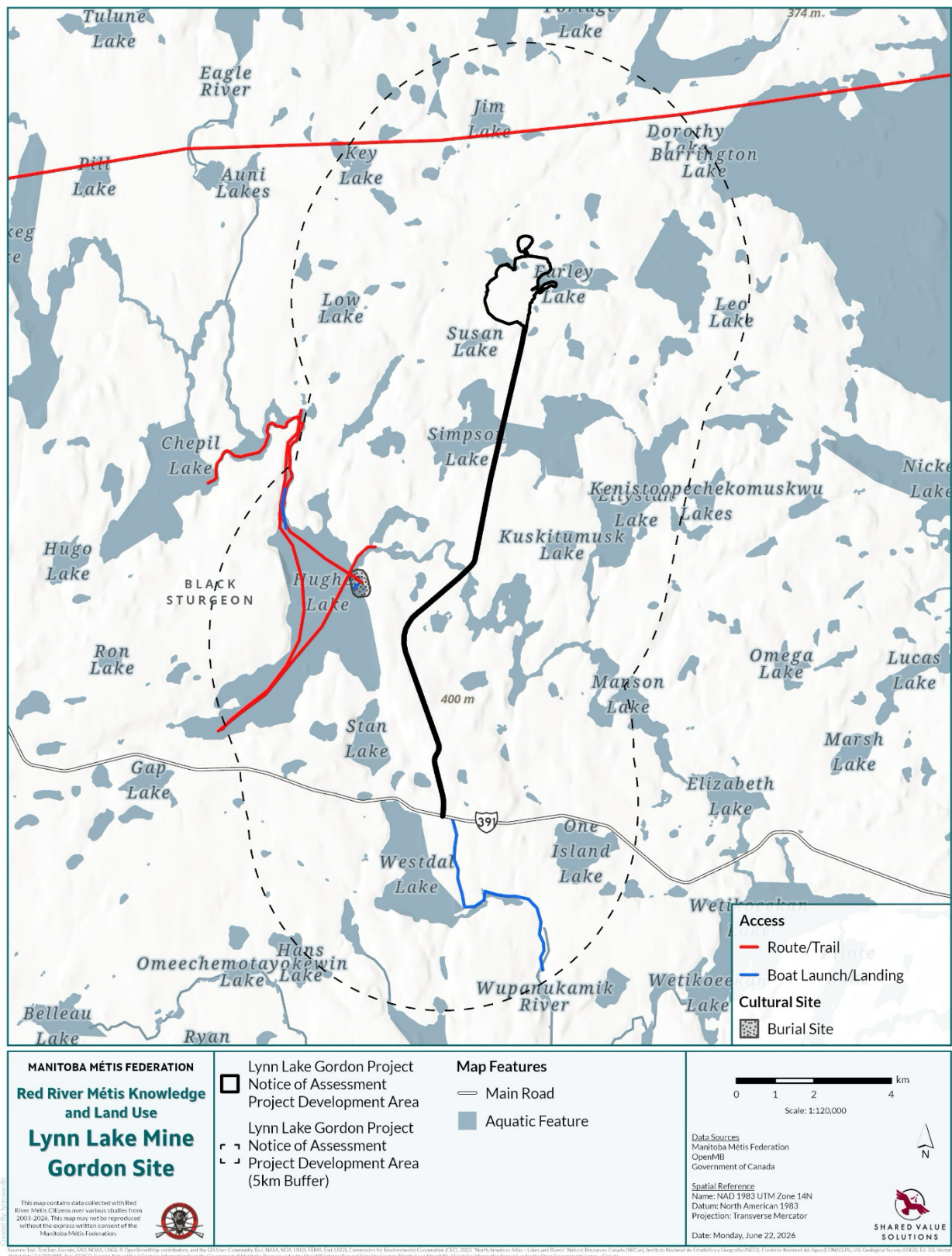


Figure 2: Access routes and cultural sites within 5km of the Project Development Area



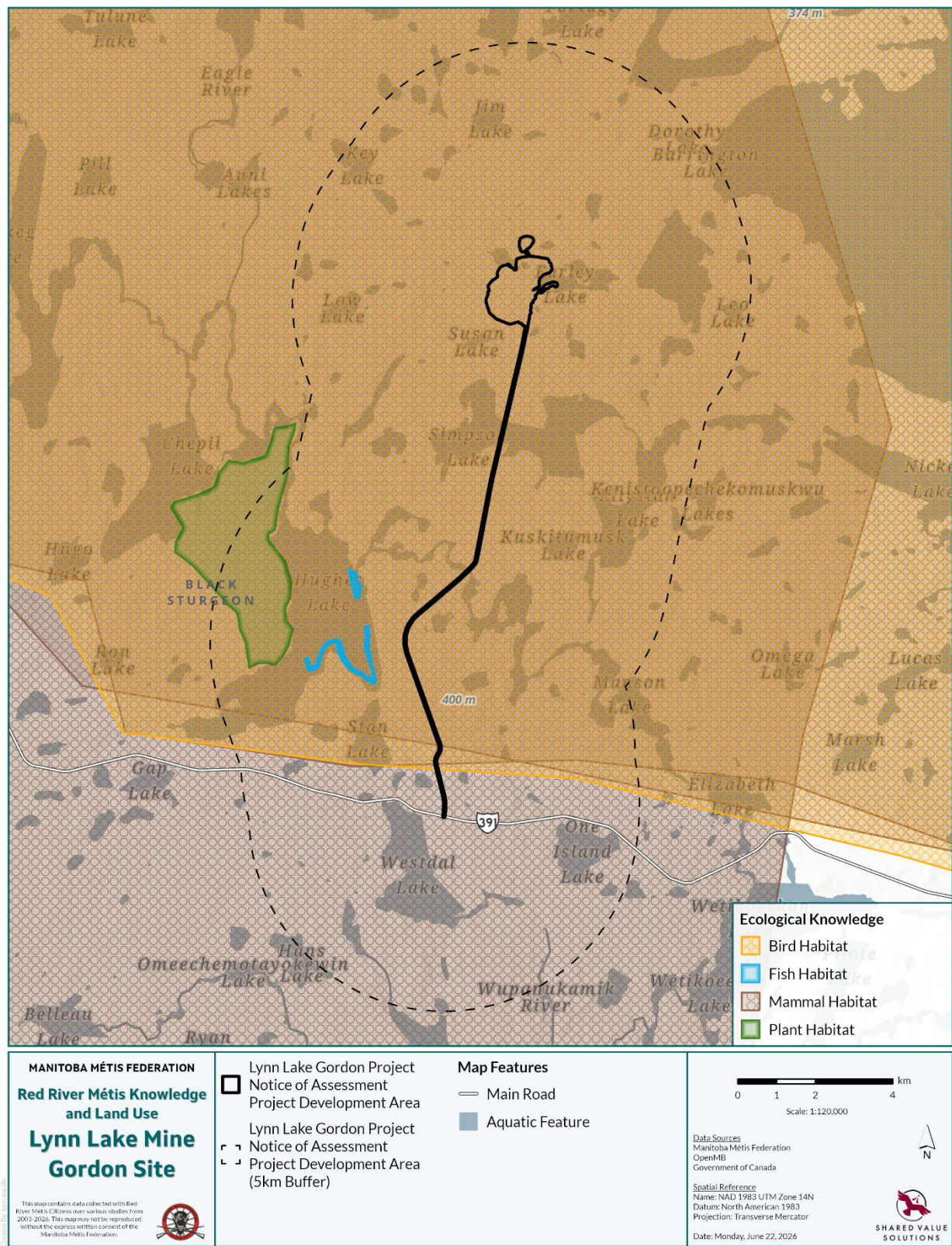


Figure 3: Red River Métis Ecological Knowledge within 5km of the Project Development Area



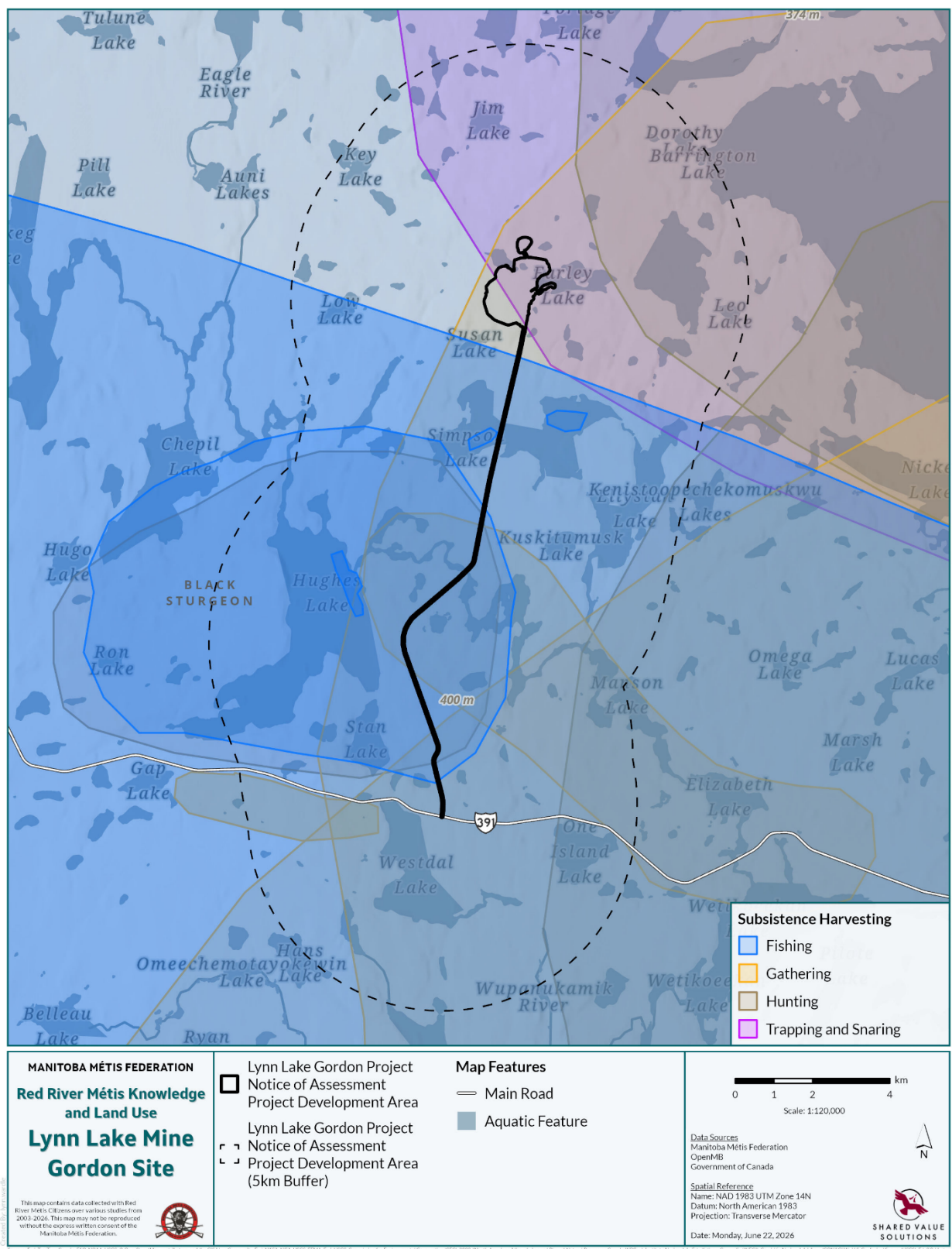


Figure 4: Subsistence harvesting within 5km of the Project Development Area

3.4 MMF Concerns

The MMF remains concerned that the proposed changes will further increase the footprint and intensity of development at the Lynn Lake Gold Project.

Red River Métis Citizens have a long history of using the lands and waters surrounding Lynn Lake for fishing, hunting, trapping, gathering, and other traditional activities. As project activities continue to expand, the potential for impacts on these activities and the resources that support them will also increase.

The MMF remains concerned about potential impacts on water quality, fish and fish habitat, and country foods. These concerns are amplified by the uncertainties identified by federal regulators regarding groundwater movement and contaminant transport. While monitoring and adaptive management are important tools, the MMF encourages regulators and the proponent to take a precautionary approach where there are uncertainties.

The MMF also remains concerned that the cumulative effects of the various project amendments approved since the original project authorization have not been fully considered from the perspective of Red River Métis land use and harvesting activities.

In closing, the MMF reiterates that meaningful engagement with the Red River Métis must continue throughout all phases of the project. The MMF expects to be informed of future project changes and provided adequate opportunity to review and comment on any proposed amendments that may affect Red River Métis rights, interests, and traditional land use.