



Lands & Resource Department
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October 4, 2021

Sean Carriere and Spencer Roth
Impact Assessment Agency of Canada
upperbeaver@iaac-aeic.gc.ca

Submitted to Agency's Registry and sent by email.

Dear Mr. Carriere and Mr. Roth,

Subject: Reference #82960, Upper Beaver Gold Project - Notification of Acceptance of Initial Project Description

Wahgoshig First Nation is aware that the Impact Assessment Agency of Canada (IAAC; the Agency) has accepted the Initial Project Description (IPD) for the proposed Upper Beaver Gold Project (UBGP; the Project). Wahgoshig First Nation would like to notify the Agency that the Project is located approximately 43km from our reserve lands and is within our traditional territory. As such, the Project is likely to have a high level of impact on our Aboriginal and Treaty rights and interests, as well as on the health, socio-economic and cultural wellbeing of our community members. As such, the Crown as represented by IAAC, has the duty to consult with Wahgoshig First Nation. **We expect both the Proponent and the Crown not only to consult Wahgoshig First Nation as a highly impacted Nation on this Project, but also to engage with our Nation in collaboration and partnership in conducting the assessment of the UBGP.**

For the past century our territory has experienced, and continues to experience, a high level of resource extraction and development. As more lands are taken up by this development, Wahgoshig First Nation continues to experience increased pressure and restrictions on our ability to practice our rights and culture in our homelands. The cumulative impact of this legacy of development in our territory needs to be considered by both the Proponent and the Agency in the assessment of the UBGP.

Please be advised that Wahgoshig First Nation has been engaging with the Proponent, Agnico Eagle, for a number of years during the advanced exploration phase of the Project and we were also engaged directly by the Proponent in advance of the submission of the IPD to the Agency. Our Nation has already completed a review of the Proponent's draft IPD over the summer of 2021, which was submitted to Agnico Eagle. **Our Nation's review and comments on the Proponent's draft IPD has been attached to this letter for the Agency's reference and consideration.** We ask that you include our review and comments in the Agency's current assessment of the Proponent's IPD.

Moving forward, our Nation formally requests to be engaged in the subsequent phases of the federal impact assessment process including in the more immediate term, the review of the Tailored Impact

Statement Guidelines and Indigenous Engagement and Participation Plan. ***In addition, we would like to formally request ongoing capacity funding from the Agency to support our participation in the subsequent phases of the federal impact assessment***, should one be initiated for the UBGp.

We request that you include the following Wahgoshig First Nation staff and advisors in all communications related to this project:

- Lance Black, Senior Manager, Negotiations & Resources for Wahgoshig First Nation
- Mike Guillemette, Director, Lands & Resources for Wahgoshig First Nation
- Sharon Plourde, Director of Resource Revenue for Wahgoshig First Nation
- Tracy Zanini, consultant to Wahgoshig First Nation from Shared Value Solutions
- Kate Kempton, legal counsel to Wahgoshig First Nation from Olthuis Kleer Townshend

Our Nation looks forward to full and meaningful engagement with the Agency and the Proponent on the UBGp. We would like to work collaboratively to ensure that any impacts from the Project to our Nation and our rights and interests are avoided, mitigated, accommodated, or compensated for. Additionally, we look forward to the opportunity to work with the Agency and the Proponent to include our knowledge, culture, rights and interests in the assessment and subsequent federal Ministers conditions for approval, as well as throughout the entire lifecycle of the UBGp.

Yours truly,



Mike Guillemette, AACI, P.App, Dipl. M.A.A., DULE
Director, Lands & Resources

CC: Chief June Black and Council
Lance Black, Senior Manager, Negotiations & Resources for Wahgoshig First Nation
Sharon Plourde, Director of Resource Revenue for Wahgoshig First Nation
Tracy Zanini, consultant to Wahgoshig First Nation from Shared Value Solutions
Kate Kempton, legal counsel to Wahgoshig First Nation from Olthuis Kleer Townshend