

# Upper Beaver Gold Project—Comment

Tailored Impact Statement Guidelines  
Public Participation Plan



Beaverhouse Lake

# Upper Beaver Gold Project

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## Tailored Impact Statement Guidelines Public Participation Plan

My name is Simon Jutras. I am a full time resident on Beaverhouse Lake from May to October. I am submitting this comment on behalf of myself, my son Kyle Jutras, my brother Richard Jutras and his daughter Heather Jutras.

My family has been on Beaverhouse lake for 72 years. It is my hope this comment will be received by the IAAC with the sincerity it is offered.

I worked on a mine site for 7 years. Four years in mine security and three years driving a rock truck underground.

The objective of this comment is to express my concerns regarding project splitting, road access, and component parts of the project that were not adequately addressed in the Initial and Detailed Project Descriptions

Equally address the lack of trust that has developed between local stakeholders on Beaverhouse Lake and the proponent Agnico Eagle.

Engagement began in 2018, by the fall of 2021 we no longer any faith in the claims of the proponent regarding an inclusive and transparent process.

I thank you for your consideration on the comment before you.

I would like to acknowledge the efforts and time of Linda Heron, [The Ontario River Alliance](#) and Kerrie Blaise of [The Canadian Environmental Law Association](#).

Sincerely,

Simon Jutras

# Upper Beaver Gold Project

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Tailored Impact Statement Guidelines  
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## Section 3.1. Project Overview

The potential synergies between the *Upper Beaver*, *Upper Canada*, *McBean*, and *Anoki* properties combined with the merger of **Kirkland Lake Gold**, requires the attention of the Impact Assessment Agency of Canada.

### Concerns:

It is vital to prevent the potential of project splitting of the *Upper Beaver Project* from the proponents land package which includes, the *Upper Beaver*, *UpperCanada*, *McBean*, and *Anoki* properties.

### Proponent Statement:

Detailed Project Description the proponent states: p.

*“Possible synergies with the Upper Beaver Gold project will be further assessed after the completion of the merger, and if conclusive, will be integrated to the Upper Beaver Gold project design and Impact Assessment, if appropriate.”*

### Proponent Statement:

Detailed Project Description the proponent states: p. 17

*“The Upper Beaver Gold project is not part of a larger project that is not listed on the Project List.”*

### The proponents contention that:

*“The Upper Beaver Gold Project is not part of a larger project that is not listed on the Project List.”* requires the attention of Impact Assessment Agency of Canada as:

- The *Upper Canada*, *McBean* and *Anoki* properties are connected by an existing road infrastructure to the Upper Beaver Project and within an 8-10 kilometer radius of the proposed Upper Beaver Mill.

See Appendix A

- The overview the land package of Agnico Eagles’s Kirkland Lake Project presented by the proponent (see page 2) offers enough information to conclude The Upper Beaver project is an integrated component of a larger project.

See Appendix B

# Upper Beaver Gold Project

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## Section 3.1. Project Overview

### Proponent Statement:

Initial Project Description p. 18, and Detailed Project Description-p. 22

*“Ongoing exploration has also identified small ore deposits close to the surface on the plateau area south of the tailings storage facility. This mineralized zone could potentially be extracted without loss of potential resources, while providing additional opportunities for site water management.”*

### Concerns:

There are contradictions, and identifications that are incomplete within the *Initial and Detailed Project Descriptions*. Having a clear coherent presentation of the project description is critical. It is my hope some of the issues I raise in this comment will be given serious consideration by the Impact Assessment Agency of Canada. The above statement appears without any additional information in the *Initial and Detailed Project Descriptions* requiring a full assessment by the Impact Assessment Agency of Canada.

### Issues to be addressed:

- Will the proponent identify the mineralized zone.
- What is the depth of the mineralized zone.
- Will these deposits be extracted through an open pit operation.
- Will this be a 2nd pit or an expansion of the proposed open pit.
- What does the proponent mean by:  
*“This mineralized zone could potentially be extracted without loss of potential resources”*
- What does the proponent mean by:  
*“providing additional opportunities for site water management.”*
- Are the current water permits issued for water extraction from Ava Lake sufficient to supply the extraction of these ore deposits from this unidentified mineralized zone.

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## Section 3.1. Project Overview

- What is the potential environmental impacts of an extraction zone being in such close proximity to tailings.
- Will there be an additional crusher working 24/7.
- What are the direct and cumulative environment impacts, dust, noise, light, wildlife, food habitat for wildlife, ground water, water table and the river system.
- Expected time frame to extract this mineralized zone
- Would blasting be daily

### Emergency EMS Access:

- What is the blast radius safety zone for the proposed pit and the mineralized zone of a potential 2nd pit. During blasts will local stakeholders be required to leave their residence if it falls within the blast safety perimeter.
- In the event of an medical emergency during a blast, will EMS vehicles have access to the lake or will EMS vehicles be held at the blast perimeter of the proposed pit or the unidentified potential pit until the blast is cleared.

**This question is important due to the remote nature of the area.**

In the summer of 2021 lake residents with EMS paramedics had to extract a resident by boat to an ambulance at the present boat launch, for transport a little further down the road to a clearing allowing a helicopter to land for transport to the Kirkland Lake hospital.

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## Section 4.4. Alternative means of carrying out the Project

Route or corridor and means options for transportation—public access roads.

### Road Access:

Road access as presented within the *Initial and Detailed Project Descriptions* needs to be considered in context of a larger integrated project, its impact directly on the local environment and community, road capacity, public access locally, and recreational access for the broader community.

The road infrastructure is critical when identifying the material components of the project that existing or proposed roads will connect to.

In the *Initial and Detailed Project Descriptions* the proponent has not been forthright in disclosing information and the cumulative impacts on:

- water crossings (rapids) between Beaverhouse and Ava Lakes
- public access to Beaverhouse Lake
- Road Safety
- Relocation of the Boat Launch
- Impact on the environment for road widening from the existing boat launch. Blasting and deforestation of the Ava lake shoreline.
- Aggregate exploration and cumulative impacts.
- Lack of transparent communication with the local stakeholders regarding road access.



Beaverhouse public access road

# Upper Beaver Gold Project

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## Tailored Impact Statement Guidelines Public Participation Plan

As a local stakeholder the following three proponent statements below offers an insight into the difficulty local stakeholders have encountered obtaining accurate information on the proposed use of the access road.

Combined with an expressed concern that the Upper Beaver Project is part of a larger integrated project and plans, there are additional concerns about the cumulative impact on road Access.

### **Proponent Statement:**

Page AppA-16 of the Detailed Project Description

*“There is no plan to modify or upgrade the Dobie Road as it is not planned to be used for the project.”*

### **Proponent Statement:**

Page AppA-9 of the Detailed Project Description

*“Agnico Eagle is committed to maintaining road conditions under their control and improving the road as the development of the project progresses.”*

### **Proponent Statement: Question 15**

Agnico Eagle Mines Ltd—Property Owners And Cottagers July 15th, 2021

*“Mr. Moffette answers: that such an upgrade is not planned for the Advanced Exploration Phase. He adds that Agnico will rather focus on repairing the road surface and fixing the ditches. The company may enlarge the road in the Production Phase. Mr. Moffette confirms that no major upgrade is to be performed before the Production Phase.”*

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## Issues to be addressed:

The Assess road is used by the community of Dobie and the surrounding communities of Kirkland Lake, Larder Lake, as well as outlying communities and the Province of Quebec.

Will the proponent comment on the potential impact of ore haulage to the *Upper Beaver Mill* from the *Upper Canada*, *Anoki* and *McBean* properties, and possible mitigation measures for the activities listed here:

- In the first stakeholder meeting with the proponent in 2018, it was suggested by the proponent that the construction of an alternate road access may be considered.
- The present public Access Road is used by local residents for walking, dog walking, ATV usage, dirt bikes, berry picking, in the summer, snowmobiles in the winter.
- Is the proponent seeking any local bylaw amendments that would directly or indirectly impact access to Beaverhouse Lake, for boating, fishing canoeing and kayaking.
- Is the proponent seeking to impose restrictions on these activities during the advanced exploration, construction and production stages, due to safety concerns.
- Road safety, and how it will be monitored through the various stages of the project development. Agnico Eagle acknowledges it does not own the road, has no authority to issue tickets.

*“The road is public, and therefore not owned by Agnico nor by the surrounding municipalities. She notes that Agnico can only encourage the truckers to behave safely on the road.”*

Cohabitation Guide Proposal Meeting Report—Property Owners And Cottagers  
July 15th, 2021

The access road is not wide enough to accommodate local public traffic and increased commercial and movement of heavy equipment deliveries, flat beds, wide loads etc.

There are numerous blind corners it is only a matter of time until there is a serious accident. Personally I have had two head to head encounters during the last two summers.



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This picture shows a log truck and my pickup passing on Beaverhouse Road.

*(Note the image in the pickup mirror indicating the limited allowance available to allow the log truck to pass.)*

I have driven underground rock trucks where such tolerances are the norm.

There will be many people who would not be comfortable with this type of situation.

It needs to be stated the driver of the log truck was courteous and there was no incident.

In the event of a serious accident, is it acceptable for the proponent to state by law the proponent has no liability on a public road access, while maximizing the road for commercial use.



Log Truck passing Pickup on Beaverhouse Road

1. Will the proponent clarify what its plans are for the present access road. Is this road to be the main access road to the mine.
2. Will the proponent commit to developing a separate road access to the Mine site.

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In the summer of 2020, the proponent advised local stakeholders that the access road to the boat launch on Beaverhouse lake would be blocked due to the proponents planned open pit. The proponent has acknowledged that the main access road, Beaverhouse Road falls under the definition of an Access Road as per the Ontario Road Access act.

APPENDIX C: RESPONSE TO SUMMARY OF ISSUES,  
Detailed Project Description, Page AppC-15 #50

*“The main access road used by the local cottagers, Beaverhouse Road, which is also the access for the project, passes over private land mainly owned by Agnico Eagle. Based on information found, the Beaverhouse Road would be an Access Road as per the Road Access Act.*

*The Court of Appeal held that an access road under the Act is a road on land not owned by a municipality; it is not a public highway; and it serves as a motor vehicle access route to one or more parcels of land.”*

Will the proponent comply with all the conditions of the [Ontario Road Access Act](#). [“c 457 Road Access Act”](#) as they apply to Beaverhouse Road the current access to the Upper Beaver Project.

### Proponent Statement: Access

p. 20 Initial Project Description

*“There is an existing site access connected to Beaverhouse Road. It is expected that a portion of the access road on site will require re-routing to avoid the open pit. An access road for local cottagers and other land users is expected to be developed so that local traffic can avoid the secure area of the mine development.”*

### Proponent Statement: Road Access

C.3.4.9 Access Detailed Project Description, p. 25

*“A new public access road will be established to provide continued access to Beaverhouse Lake while avoiding the secure area of the mine development. A preliminary route has been identified for consultation purposes, from the existing road near the Victoria Creek crossing, across the Misema River, between Ava Lake and Beaverhouse Lake, and ending near the north shore of Beaverhouse Lake (Figure C.1)”*

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As of March 11, 2022 there has been no consultation offered by the proponent with regards to the new access road and new boat launch. In the stakeholder meeting with the proponent on July 15, 2021 the following question was asked.

*“A participant asks to be given an update on the bypass of Beaverhouse road.”*

### **Proponent Statement:**

Agnico Eagle Mines Ltd—Property Owners And Cottagers July 15th, 2021

*“Mrs. Morin (Agnico Eagle) answers that this is an option for the Production Phase only.”*

*“Mr. Gauthier (Agnico Eagle) asks if Mrs. Morin could remind the participants the production phase timeline. ”She (Mrs. Morin) replies that production is planned for 2026 or 2027.”*

The proponent has consistently deflected direct questions in meetings since 2020, which is reflected in the above statement from Mrs. Morin and Mr. Gauthier.

The Detailed Project Description provides similar responses such as:

*“Agnico Eagle will hold a workshop with cottagers, land owners and other users of the boat launch to gather suggestions that would meet the needs of most users.”*

Page AppA-11

It is the responsibility of the proponent to present possible locations for the extension of the new access road for public access to Beaverhouse Lake and boat launch. The local stakeholders will comment and offer suggestions or alternate locations once they have been presented.

During the spring and summer the issue at the fore of the proponent’s public consultation was to promote the sale and purchase of properties around Beaverhouse Lake. None of the local stakeholders had expected this to be on the table so early in the consultations with Agnico Eagle.

Legitimate questions regarding an access road are deflected with the justification that the Upper Beaver Project is not at that stage of development. Though the offers of purchase was deemed important enough that it was essential to have these discussions before advanced exploration. The proponent’s dissemination of information to stakeholders is solely based on the proponents objectives

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## Tailored Impact Statement Guidelines Public Participation Plan

In the Initial and Detailed Project Descriptions, the proponent marked the proposed new access road on Figures B. 1 & C. 1, with a black line. Descriptive text is ambiguous. The proponent indicated:

*“A new public access road will be established to provide continued access to Beaver house Lake while avoiding the secure area of the mine development. A preliminary route has been identified for consultation purposes, from the existing road near the Victoria Creek crossing, across the Misema River, between Ava Lake and Beaverhouse Lake, and ending near the north shore of Beaverhouse Lake (Figure C.1).”* page 26 Detailed Project Description

- There is no indication on Figure C. 1 where the intersection from the new public access road to Beaverhouse Lake and the potential new boat launch will be.
- The proponent is undertaking aggregate pit exploration on the south shore, and has identified a potential Glacio-fluvial Deposit. See Figure C. 1
- Will the aggregate operations become an active zone of mine production.
- A public access road cannot pass through an active production zone on mine property.

Is the real reason the proponent is delaying consultations on the new access road, due to the fact an extension is required from the proposed access road to allow public access to Beaverhouse Lake and landing, which may pass through a potential undisclosed active aggregate production zone.

I would ask the IAAC seek clarification from the proponent on the aggregate operation identified in the Detailed Project Description, and disclose all direct and cumulative impacts of the potential aggregate operations, and direct, indirect and cumulative impact regarding:

- mine access roads
- new public access to Beaverhouse Lake and proposed new boat launch
- water crossings
- safety issues
- mine operations
- aggregate haulage, alternative means for the haulage of aggregate to mine site via Fork Lake Road, considering: define state of Fork Lake Road & upgrading required to sustain commercial transportation, public and recreational use.

# Upper Beaver Gold Project

## Tailored Impact Statement Guidelines Public Participation Plan

Fork Lake road is used extensively by a Beaverhouse Lake resident, and the broader communities for recreational, ATV and snow machine use.

Define the potential direct and cumulative impacts on the Fork Lake Resort residents.

- Environmental impacts, ground water, water table, noise, dust, light, wildlife, wildlife habitat, permits required, permit schedules, local stakeholder notifications when permit applications are filed.

### Proponent Statements:

Agnico Eagle Mines Ltd—email response December 10, 2021

Figure C. 1 dated December 2021 Annotated & Cropped provided by the proponent.

These annotations are not found in the Initial or Detailed Project Descriptions.

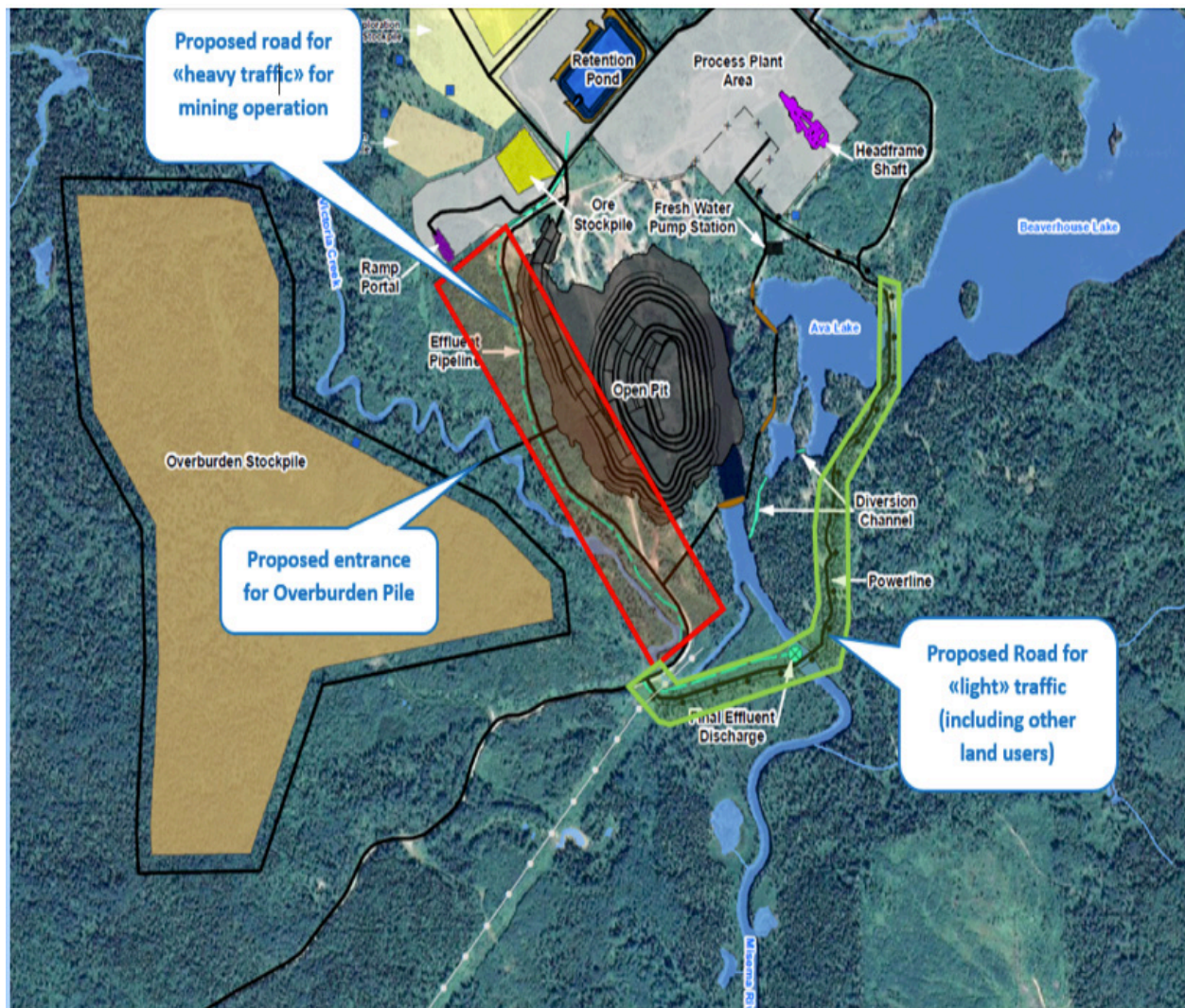


Figure C. 1

# Upper Beaver Gold Project

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Tailored Impact Statement Guidelines  
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## Water Crossing—Rapids between Beaverhouse & Ava Lakes



Rapids between Beaverhouse & Ava Lakes

The rapids between Beaverhouse Lake and Ava Lake have been described in the [Initial Project Description](#), p. 20, Figure B. 1 and [Detailed Project Description](#), as “Three new water crossings are currently proposed for the Upper Beaver Gold project, likely as culverts, but potentially as bridges (Figure C.1). The development of this water crossing, combined with the integration of multiple project components, requires the IAAC to provide a detailed oversight into the direct and cumulative impacts of:

- Proposed new road access,
- A potential aggregate operation on the south shore
- Transportation of Aggregate
- proposed water crossing, a culvert or bridge
- A potential aggregate operation on the south shore
- Deforestation for road widening on the north and south shore
- Impact on fish travel and spawning habitat

# Upper Beaver Gold Project

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## Aggregate Operations

Since 2018 local stakeholders of Beaverhouse Lake have had conversations with stakeholders from other communities, only to discover that information offered by the proponent in public settings appears to be selective and at times without full disclosure of the proponents plans.

In August of 2021, a local resident of Beaverhouse Lake, discovered that sites for potential aggregate sites were being staked on the south side of the Misema River.

In our meeting with the proponent on July 15, 2021, the proponent offered no information regarding potential aggregate exploration and operations. The release of the [Initial Project Description](#) in September 2021 confirmed that exploration for Aggregate pits were taking place in August 2021.

Since 2018 the proponents stated public position is they are open, transparent and inclusive in their community co-habitation.

On September 22, 2021 the proponent was advised by Beaverhouse Lake resident Doug Desjardins that local stakeholders no longer trusted the proponents public statements of being committed to a inclusive and transparent dialogue.

## September Stakeholder meeting with the proponent

- Beaverhouse Lake resident Doug Desjardins asked the proponent why local stake holders had not been advised of the aggregate exploration taking place on the south side of the Mesima River.

### Proponent Statement:

Agnico Eagle Mines Ltd – Property Owners And Cottagers September 22, 2021

*“Mrs. Morin confirms it that the quarry was added at the last minute into the [Initial Project Description](#) as the project’s design changed rapidly, even for the team. She apologies for the situation.”*

The proponents [Initial Project Description](#) contradicts the proponents response to Beaverhouse resident Doug Desjardins. Information regarding aggregate operations had been provided to First Nation communities, allowing them time to comment on the [Initial Project Description](#), see:

## APPENDIX B: COMMUNITY INPUT AND OUTCOMES – INDIGENOUS NATIONS

Page AppB-7 and Page AppB-8.

# Upper Beaver Gold Project

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## Tailored Impact Statement Guidelines Public Participation Plan

### Water Crossing—Rapids between Beaverhouse & Ava Lakes

*“A new public access road will be established to provide continued access to Beaverhouse Lake while avoiding the secure area of the mine development. A preliminary route has been identified for consultation purposes, from the existing road near the Victoria Creek crossing, across the Misema River, between Ava Lake and Beaverhouse Lake, and ending near the north shore of Beaverhouse Lake.”*

#### Issues to be addressed:

The proposed new access road as indicated in Figure C. 1 crosses to the north shore on a *proposed* water crossing at the rapids, and continues to the mine site.

Will the proponent address and provide a detailed description of all the required integrated components for the new road access, water crossing of the Misema River and the water crossing at the rapids of Beaverhouse Lake. Providing complete descriptions to the points below and alternative means for the water crossings and new access road.

#### New access road & Water crossing of the Misema River

- Alternatives to water crossing of the Misema River, such as a new separate road to the mine site thus eliminating all mine related traffic from Beaverhouse Road.
- Type of crossing, culvert or bridge
- Potential environmental impact immediate and cumulative on the river.
- Potential environmental impact immediate and cumulative on the wetlands the new access road passes through.
- Details of Deforestation and blasting required on the south shore of the new access road.
- Will the new access road intersect with potential access roads to the pit
- Will lighting be installed along the new access road
- Define the type of use and vehicles anticipated for the new access road, commercial, contractors, employees and staff.
- Where will heavy loads, wide loads enter and leave the mine site.
- How will wide loads on Beaverhouse Road be handled during the Advanced Exploration Stage and Construction Stage



# Upper Beaver Gold Project

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## Tailored Impact Statement Guidelines Public Participation Plan

### Safety

- Will the new access road fall within the pit blast safety perimeters.
- Will EMS vehicles and Emergency Services vehicle be held at the blast perimeter during blasts.
- Will there be a restricted zone imposed on boat traffic by the rapids due to mine operations.

### Boat Launch

- Where will the new access road be diverted to the proposed new boat launch.
- Will the blast perimeter extend to boat traffic on the lake.
- Will the new access road fall within the pit blast safety perimeters.

### Water Crossing at the Beaver House Lake Rapids

- Type of proposed crossing, culvert or bridge
- Load capacity
- Will this crossing potentially accommodate ore or aggregate haul trucks
- Potential environmental impact immediate and cumulative on the river.
- Details of Deforestation and blasting required on the north shore to widen the existing single lane bush road from the existing boat launch to the mine site.
- Lighting
- Impact on spawning grounds

# Upper Beaver Gold Project

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## Deforestation: Water Crossing—Rapids between Beaverhouse & Ava Lakes Dikes & Diversion of the Misema River

- Describe the impact of deforestation on the north and south shoreline of Ava Lake resulting from new and existing access road construction, widening and blasting, access required to install dikes in Ava Lake and the diversion of the Misema river on the south shore of Ava Lake.



Ava Lake

## Aggregate Operations:

- Identify aggregate locations
- Identify immediate and cumulative environment impacts, sound, dust, light
- Wildlife, habitat, food habitat, wildlife trails, nesting
- Proposed transportation routes for aggregate, water crossing York Lake route, or a new access road for aggregate transportation

# Upper Beaver Gold Project

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## Fish Habitat – Spawning

In the Detailed Project Description:

Appendix B: Community Input And Outcomes – Indigenous Nations Page AppB-4 under Key Issues the following concern is expressed:

*“Potential impacts on spawning beds, close to the boat launch of the Beaverhouse Lake.”*

**Proponent Statement: Detailed Project Description-page AppB-4**  
**RESULTS OF ENGAGEMENT:**

*“There is no plan for development in this area. No other impacts are expected.”*

The Proponents statement from the Results of Engagement is not true and disrespectful. This type of statement by the proponent within an official document for review erodes stakeholders Trust. Trust is earned.



Beaverhouse Boat Launch and Rapids - Looking east early morning

# Upper Beaver Gold Project

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Tailored Impact Statement Guidelines  
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## Road Monitoring

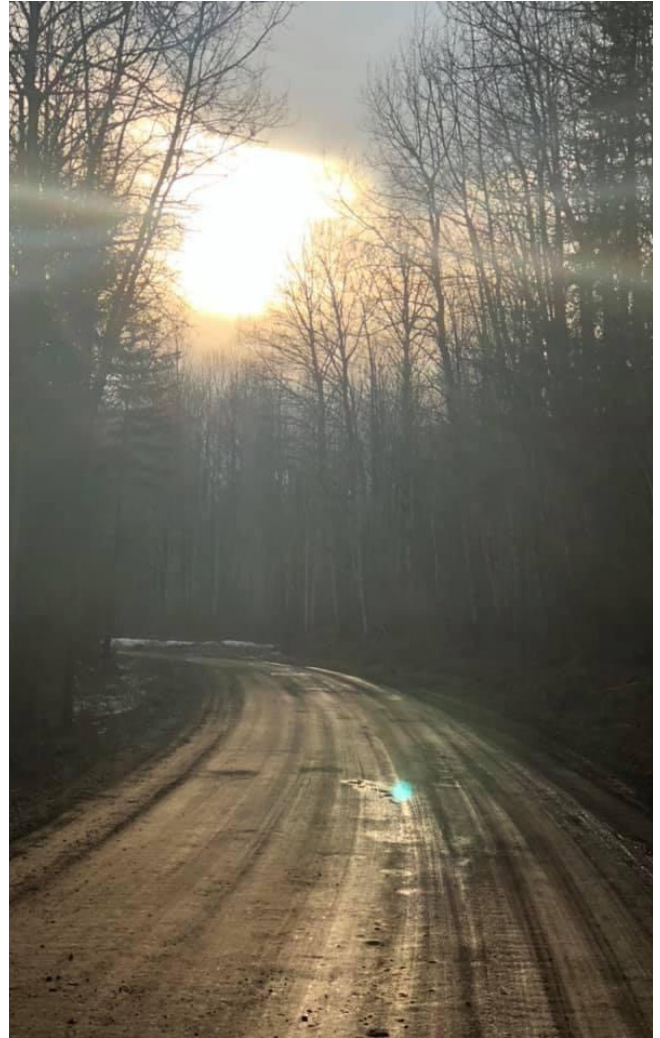
### C.3.4.9 Access p. 25 Detailed Project Description

There is an existing site access connected to Beaverhouse Road. Based on a traffic assessment during summer 2021 that monitored periodically between July 4 and September 10, there was 1 to 21 vehicle trips each day (24-hour period), that were not identified as being associated with mining exploration or forestry activities.

These trips are conservatively assumed to be members of the public or Indigenous Nations.

Will the proponent provide details of their traffic assessment during the summer of 2021, between July 4 and September 10 2021:

- The dates monitoring took place.
- Weather conditions on the days of monitoring
- Times of the day when monitoring took place.
- Was ATV and dirt bike travel monitored
- Where was the monitoring station



Beaverhouse Lake Road

# Upper Beaver Gold Project

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## Wildlife

The existing access road itself is an open trail for all types of wildlife:



- Lynx
- Moose
- Bear
- Fox
- Deer
- Cougar

Bear on Beaverhouse Lake Road

There are Moose and bear trails that intersect with the access road, food habitat has already been impacted. Bears regularly have feed at the top of the hill before Victoria Creek, this habitat was lost (raspberries) last year with the road work conducted by the proponent.

Initial road modifications have already taken place, trees removed, road widened, road work on the hill to Victoria creek has been extensive.

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Stakes appeared in the late fall of 2021, indicating the Open Pit, Dikes and the Fresh Water Pump Station.

- Will any work or site preparation be taking place in 2022 for the Open Pit, Dikes or the Fresh Water Pump Station.

Word on the street, from a reliable source says that Agnico Eagle is hiring anticipating that work will be proceeding at the Upper Beaver project.

- Will the proponent advise the IAAC and local stakeholders of work to be commencing in 2022.



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**Proponent Email:**

Email received December 10, 2021 at 4:01 PM

*“The first step would be the construction of the exploration shaft headframe and water management facilities. This work could start in spring 2022, provided that all required permits and internal approval are obtained.”*

*Agnico Eagle*



Stake for Ava Lake Dike

# Upper Beaver Gold Project

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## Public Participation Plan – Comment

I am grateful for the opportunity to participate in the IAAC process. In writing this comment a major issue came to the fore. I believe mining industry projects are complex and require time and expertise to fully understand the implications of the stated objectives.

I would recommend the following:

- Upon acceptance of a project under the IAAC, it is important for individuals wishing to comment to have access to government experts, engineering, geology, hydrology, Biologist, legal, and environmental.
- The IAAC have a process in place where upon request an individual is provided with an access document that lists, government selected agencies, and experts that are available to the public.

The largest concern I have is the apparent disconnect between the IAAC process and the Ontario permitting process. The proponent is able under Advanced Exploration to construct the basic infra structure of this project. By the time the project enters the production stage, it is really a formality.

Based on the following quote from the proponent.

*“The first step would be the construction of the exploration shaft headframe and water management facilities. This work could start in spring 2022, provided that all required permits and internal approval are obtained.”*

*Agnico Eagle, December 2021*

It is difficult to accept that the Upper Beaver project while under review by the IAAC is proceeding down an open canyon between the regulatory bodies of federal (IAAC), and provincial jurisdictions.

I anticipated the release of the Detailed Project Description. Upon reading it I was struck by the minimal amount of additional detail that was offered.

What I did not expect to find is the statement *“if an Impact Assessment is required.”* 186 times, in the PDF of the DPD.

The sheer number of times this statement was made signifies the real intentions of the proponent. If an IAAC had not been called for, would local stakeholders be able to access the information that *“if an Impact Assessment is required.”* 186 times referred to. I think not.

As indicated I am pleased to partake in the process, but I had no idea how weighted this process is in the proponents favor.

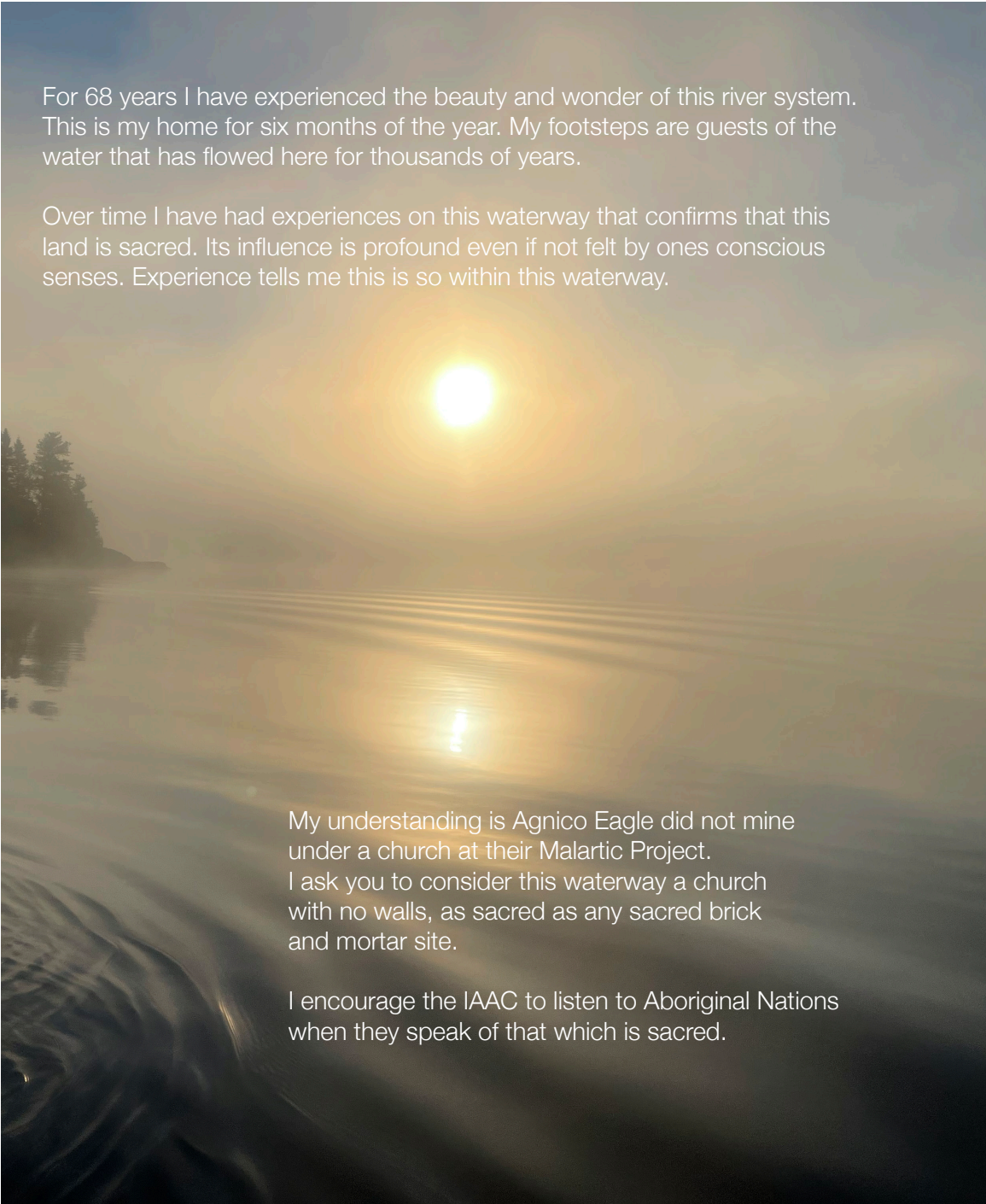


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## Summary



For 68 years I have experienced the beauty and wonder of this river system. This is my home for six months of the year. My footsteps are guests of the water that has flowed here for thousands of years.

Over time I have had experiences on this waterway that confirms that this land is sacred. Its influence is profound even if not felt by ones conscious senses. Experience tells me this is so within this waterway.

My understanding is Agnico Eagle did not mine under a church at their Malartic Project. I ask you to consider this waterway a church with no walls, as sacred as any sacred brick and mortar site.

I encourage the IAAC to listen to Aboriginal Nations when they speak of that which is sacred.

Beaverhouse Lake

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## Appendix A

### Kirkland Lake—Upper Beaver Gold Project

The Kirkland Lake exploration properties have been owned 100% by Agnico Eagle since March 28, 2018

Agnico Eagle is focusing on the Upper Beaver and Upper Canada deposits, which are near each other. Probable mineral reserves have been estimated at Upper Beaver of 8.0 million tonnes grading 5.43 g/t gold and 0.25% copper (containing 1.4 million ounces of gold and 19,980 tonnes of copper) as of December 31, 2020, and there are substantial indicated and inferred mineral resources. At the Upper Canada deposit, there are indicated mineral resources of 10.4 million tonnes grading 2.15 g/t gold (containing 722,000 ounces of gold) and inferred mineral resources of 18.6 million tonnes grading 3.11 g/t gold (containing 1.9 million ounces of gold) at underground and open pit depths.



The combined indicated mineral resources at the property's Anoki and McBreen deposits have been estimated at 1.9 million tonnes grading 5.33 g/t gold (containing 320,000 ounces of gold) as of December 31, 2020, and there are additional inferred mineral resources, all at underground depths.

At the Amalgamated Kirkland (AK) deposit, the underground mineral resource estimate includes indicated mineral resources of 1.3 million tonnes grading 6.51 g/t gold (containing 266,000 ounces of gold) as of December 31, 2020, as well as inferred mineral resources.

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## Appendix B—Kirkland Lake Properties

<https://www.agnicoeagle.com/English/exploration/exploration-projects/Kirkland-Lake-project/default.aspx>

### The Kirkland Lake Exploration Properties:

The Kirkland Lake exploration properties have been owned 100% by Agnico Eagle since March 28, 2018.

### Overview

The 25,506-ha land package that makes up Agnico Eagle's Kirkland Lake project was formerly owned by a succession of junior exploration companies.

Agnico Eagle is focusing on the Upper Beaver and Upper Canada deposits, which are near each other. Probable mineral reserves have been estimated at Upper Beaver of 8.0 million tonnes grading 5.43 g/t gold and 0.25% copper (containing 1.4 million ounces of gold and 19,980 tonnes of copper) as of December 31, 2020, and there are substantial indicated and inferred mineral resources. At the Upper Canada deposit, there are indicated mineral resources of 10.4 million tonnes grading 2.15 g/t gold (containing 722,000 ounces of gold) and inferred mineral resources of 18.6 million tonnes grading 3.11 g/t gold (containing 1.9 million ounces of gold) at underground and open pit depths.

Recent exploration activity at the project focused on conversion drilling of shallow and deep mineral resources at the Upper Beaver deposit. During 2020, 103 holes or branches were drilled, totalling 28,300 metres at the Kirkland Lake project, mostly at Upper Beaver.

The combined indicated mineral resources at the property's Anoki and McBean deposits have been estimated at 1.9 million tonnes grading 5.33 g/t gold (containing 320,000 ounces of gold) as of December 31, 2020, and there are additional inferred mineral resources, all at underground depths. At the Amalgamated Kirkland (AK) deposit, the underground mineral resource estimate includes indicated mineral resources of 1.3 million tonnes grading 6.51 g/t gold (containing 265,000 ounces of gold) as of December 31, 2020, as well as inferred mineral resources.

### Geology

The properties lie within the southern Abitibi Greenstone Belt of the Superior Province of the Canadian Shield, approximately 110 km west of Agnico Eagle's LaRonde mine. The area is underlain by an east-west-trending linear Timiskaming assemblage comprised of volcanic and sedimentary rocks as well as synvolcanic intrusion emplacements consisting typically of diorite, syenite, quartz-feldspar porphyries and monzonite. The assemblage, deposited in a sub-aerial to shallow marine arc-rift environment, is typically bound to the south by the Larder-Cadillac Break (LCB) – which is a major east-trending, south-dipping regional structure that juxtaposed Tisdale mafic to ultramafic rocks (south of the fault) against much younger Timiskaming sedimentary rocks. The LCB lies within the Larder Cadillac Deformation Zone (LCDZ), which is a wide structural zone cutting across several lithologies.

# Upper Beaver Gold Project

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## Appendix B—Kirkland Lake Properties

### Mineralization

There are three main deposits on the properties:

The Upper Beaver deposit's gold-copper mineralization is mainly hosted in the Upper Beaver alkalic intrusive complex and the surrounding basalts it intruded, and is associated with disseminated pyrite and chalcopyrite, and magnetite-sulphide veining associated with strong magmatic-hydrothermal alteration. The mineralization occurs as elongated tabular bodies that strike northeast, dip steeply northwest and plunge 65 degrees to the northeast. The mineralization has been defined along a 400-metre strike length from surface to a depth of 2,000 metres and it remains open at depth.

The Upper Canada deposit lies approximately 6 km southwest of the Upper Beaver property, and 1.6 km north of the main LCDZ, within a 300- to 400-m-wide strongly altered deformation corridor. Host rocks are primarily volcanic (trachyte) tuffs and sediments that have been intruded by syenite bodies. Gold mineralization is associated with intensely altered shear zones with fine pyrite and ancillary sulphide mineralization. En-echelon higher-grade lenses are present within a broader envelope of lower grade mineralization.

The AK (Amalgamated Kirkland) deposit consists of lode-style gold mineralization hosted by altered and pyritic Timiskaming volcanic and sedimentary rocks. The deposit is hosted in one of many northeast-trending structures that lie between the Kirkland Lake Main Break and the LCDZ. The gold mineralization is of two types: gold-bearing quartz and quartz breccia veins, and gold within pyrite-altered host rocks.

#### Exploration

In 2021, the Company plans to drill 36,500 metres at Upper Beaver in a program that will include additional shallow drilling to test an open pit concept and further deep drilling to convert mineral resources to mineral reserves. An internal technical evaluation at Upper Beaver that will include an updated mineral reserve and mineral resource estimate incorporating drill results from 2020 and 2021 is expected to be completed by the end of 2021.

Elsewhere on the Kirkland Lake property in 2021, the Company plans to drill 15,700 metres in a regional exploration program that will include Upper Canada and Bidgood as targets.



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## Appendix D—Figure C. 1 December 2021

Detailed Project Description

