

THE HONOURABLE STEVEN GUILBEAULT,
Minister of Environment and Climate Change Canada

Subject: Agnico Eagle—Upper Beaver Gold Project—IAAC Review

Dear Minister Guilbeault,

I am writing you regarding the Upper Beaver Gold Project and your departments review of it. I am retired and have substantial experience dealing with mine projects during my time working in the Department of Indian and Northern Affairs (DIAND) in the Northwest Territories. I developed the departments system of review under the Environmental Assessment and Review Process EARP. Our review was to determine if a proposed project had significant impacts and if so would be referred to the Federal Environmental Assessment and Review Office (FEARO) with the Department of Environment in Ottawa.

The Proponent, Agnico Eagle, has been in communication with the residents of the area for the past four years. Unfortunately the proponents public claims of “*being open and transparent*”, have not been the case and our questions continue to go unanswered or discussed. It was because of this that we organized into what is now the Misema–Blanche River Alliance. I have begun to suspect that the IAAC has determined that no significant impacts will occur and have decided to not conduct a full and thorough review of this project.

Our conclusion comes from the fact that the IAAC has not replied to several correspondences with questions and when the IAAC does reply they have directed us to contact the Proponent. Several individuals and organizations have put time and resources into twice writing and submitting their positions to the IAAC. in the hopes of having the IAAC provide a fair and transparent review of The Upper Beaver Gold Project.

The proponents Press Release of August 11, 2022 confirms the description of the Upper Beaver Gold Project has now expanded beyond the proponents Detailed Project Description which initiated the IAAC review. In order to ensure an open and transparent process, that will include consideration of the additional impacts of an expanded project, we are asking the IAAC to initiate a moratorium on The Upper Beaver Gold Project Impact Assessment until 2023, when the proponent has released their 2023 internal study. “*The Company’s internal study on Upper Beaver is expected to be updated in 2023 taking into consideration synergy opportunities from the Merger*” with Kirkland Lake Gold.

The following two statements from the August 2022 Press Release further highlight aspects of project that were not included in the Project Description.

1. “An increase in mineral resources is expected from this newly drilled gap area where no information was available for previous mineral resource estimates for Upper Beaver.”
2. “The Company’s assets within the camp include the Macassa mine, the adjacent AK deposit, the Upper Beaver and Upper Canada deposits farther east as well as several other occurrences and adjacent joint venture interests.”

In the Detailed Project Description on p. 17 the proponent states: “The Upper Beaver Gold project is not part of a larger project that is not listed on the Project List.”

The Press Release on August 11, 2022 contradicts the above statement. “The objective is to develop additional mill feed for a future Upper Beaver mining operation, which includes target areas such as Upper Canada, Anoki-McBean, Munro and Bidgood.”

In light of Agnico Eagle's recent public statements, the current Detailed Project Description does not address the opportunities the proponent is considering resulting from the merger with Kirkland Lake Gold.

WE ARE ASKING FOR THE FOLLOWING POINTS:

1. For a fair and transparent process we would ask for a pause in the review process until the Proponent can produce a revised Detailed Project Description to include:
 - Full disclosure of all existing ore bodies and potential new ore bodies resulting from continued exploration activities
 - Disclosure of Adjacent Joint Venture Interests
 - A full and transparent review of all potential environmental impacts on the Misema and Blanche Rivers in a revised Detailed Project Description.
2. Request the Proponent revise their project description to include additional mines that will be processed through the Upper Beaver Mill.
3. The Upper Beaver Gold Project be reviewed at the highest and most detailed level by the IAAC as we consider this project to have significant impacts..
4. The Proponent should not be responsible for identifying significant impacts or mitigating measures. The IAAC and Environment and Climate Change Canada should be responsible for these objectives.
5. To have your department provide updates and status reports to all persons and agencies that have provided submissions to you.

It is encouraging to bring our concerns to you knowing your background with environmental issues and your work to protect it. We understand a mine will be built, we hope some adjustments can be made in the planning of the mine to minimize the impact on the environment and residents by placing the proposed Mill and Tailings further away from the Misema river, no diversion of the river and no open pit.

Thank you for your considerations and we look forward to receiving your positive reply.

Sincerely,

Doug Desjardins