September 24, 2026

To: Impact Assessment Agency of Canada — Upper Beaver Gold Project team, UpperBeaver@iaac-aeic.gc.ca

Cc: Agnico Eagle Mines Limited: relations.upperbeaver@agnicoeagle.com, amy.danchuk@agnicoeagle.com

From: Misema Blanche River Alliance

Re: Request for Upper Beaver Advanced Exploration water monitoring data (IAAC Reference No. 82960)

We ask the Agency to require Agnico Eagle Mines (AEM) to file on the Registry the water monitoring results it collects under Industrial Sewage Works ECA 6439-C4MPJZ at the Upper Beaver Advanced Exploration site, and to consider them in its review of the Impact Statement. They are the only measured record of how AEM's water treatment performs at this site.

The ECA allows up to 12,000 m^3/day of treated effluent to the Misema River. It requires weekly effluent sampling, receiving-water sampling at seven stations, groundwater sampling at 16 wells, and an Annual Performance Report to MECP by March 31 each year. Six receiving-water stations, including the Beaverhouse Lake outlet (M1), are sampled monthly; the seventh (M2) is sampled quarterly.

Water was the topic of two Upper Beaver Advisory Committee meetings in 2025. The draft minutes of the July 29, 2026 meeting record the follow-up only as sharing "the range of parameters that are tested in the effluent." On September 23, 2026, AEM's consultant responded with images of ECA Tables C-1, D-1, D-2 and D-3. Those tables set out limits and sampling requirements. They contain no results, and their footnotes were cut off.

Records requested

1. All Annual Performance Reports submitted to MECP.
2. Effluent results for every Table D-1 parameter, with laboratory detection limits.
3. Receiving-water results for every Table D-3 station, including pre-discharge baseline.
4. Groundwater results from all ECA monitoring wells.
5. All reported limit exceedances, toxicity test failures, spills and overflows, with corrective actions.
6. The mixing zone validation assessment and the biological monitoring program design.
7. The complete ECA tables with footnotes, and any amendments issued since April 2022.

Why it matters

The metal limits in Table C-1 are strict. The gaps are elsewhere:

- **Mercury and sulphate have no limits.** Both are sampled weekly under Table D-1, but neither appears in Table C-1, and neither does total dissolved solids. Sulphate drives mercury methylation in downstream wetlands.
- **Mercury detection is too coarse.** The ECA only requires mercury to be measured to 0.000026 mg/L (26 ng/L), well above typical regional background of a few ng/L. Receiving-water results can read "not detected" while mercury rises. Methylmercury is not monitored.

- **Metal limits are monthly averages.** Only CBOD5 and TSS have daily maximums, so one high weekly result can be averaged below the limit.
- **No action triggers.** Tables D-2 and D-3 require receiving-water sampling but set no levels that require a response.
- **Monthly grab samples miss events.** Freshet and storm pulses fall between samples, winter samples are taken only "when conditions allow," and station M2 is sampled only quarterly.

The proposed mine would add a tailings facility and a larger discharge, over a mine life of up to 14 years. AEM's July 29, 2026 committee presentation also refers to an "alternate discharge pipeline" into Beaverhouse Lake. The Agency should see how the existing system has performed before accepting the Impact Statement's water quality predictions.

Requests

1. Direct AEM to file items 1 to 7 on the Registry within 30 days.
2. Confirm in writing that the Agency will consider this record in its review.
3. If AEM does not provide the records, request them from MECP.

Sincerely,

Michael Chaves
Misema Blanche River Alliance

Sources

- ECA 6439-C4MPJZ, Industrial Sewage Works Servicing Upper Beaver Zone Advanced Exploration Project, April 11, 2022
- Email from Transfert Environnement et Société to the Upper Beaver Advisory Committee, "Advisory Committee Meeting #9 minutes for review," September 23, 2026, with the attached draft minutes of the July 29, 2026 meeting