Mike Chaves
Guelph, Ontario
<email address removed>

September 23, 2026

Mike Atkinson
Impact Assessment Agency of Canada

Re: Upper Beaver Gold Project (Registry Reference No. 82960): reliability of the proponent's engagement record

Dear Mr. Atkinson,

Thank you for your response. I accept that IAAC does not enforce privacy law. My question is a different one: who ensures that the record of public input the Agency relies on is accurate?

Agnico Eagle is responsible for its Impact Statement, including the work of the consultants and software vendors it has hired. The Guidelines require it to summarize the issues the public raised and explain how that input was used. Stance labels such as “Opposition” and “Neutral” are applied before that summary is written, so they shape what the Agency eventually sees. Under the *Impact Assessment Act*, meaningful public participation is a purpose of the Act (s. 6(1)), the Agency must ensure it (s. 27), and public comments must be considered (s. 22(1)). The reliability of the engagement record therefore falls within the Agency’s mandate, whoever compiled it.

I respectfully ask:

1 Will the Agency rely on the proponent’s engagement summary without verifying how it was compiled, including whether input was categorized by stance?

2 Your letter confirms the proponent must follow ethical guidelines on data collection. Who verifies compliance with that requirement, and how?

3 Will the Agency require Agnico Eagle to answer my Part A questions, and will its response be posted to the Registry?

I would also ask whether IAAC itself uses automated or AI tools to process the public comments it receives.

Federal regulators have treated the quality of this proponent’s engagement records as a compliance matter before. In 2023, CIRNAC found that Agnico Eagle’s Nunavut correspondence log contained “minimal usable data” compiled “at random.”

I would appreciate a written reply, and I ask that this letter and your response be placed on the Registry.

Sincerely,

Mike Chaves
Property owner, Beaverhouse Lake (Gauthier Township)