Misema–Blanche River Alliance · Beaverhouse Lake Cottagers Association
Correspondence: Misema–Blanche River Alliance, mbralliance@gmail.com

October 2, 2026

Sent by email

Upper Beaver Gold Project Team
Impact Assessment Agency of Canada
200-1801 Hollis Street
Halifax NS B3J 3N4
UpperBeaver@iaac-aeic.gc.ca

Re: Upper Beaver Gold Project (Registry Reference No. 82960) — Impact Statement Submission 1 and the water studies it relies on but does not include

Dear Upper Beaver Gold Project Team,

We write on behalf of the Misema–Blanche River Alliance (MBRA) and the Beaverhouse Lake Cottagers Association. We have reviewed Impact Statement Submission 1 (Submission 1), which Agnico Eagle Mines Limited (AEM) has posted on its project website, against the Tailored Impact Statement Guidelines (TISG). This letter builds on our letter of October 2, 2026 about the Beaverhouse Lake effluent outfall and the engagement record.

Submission 1 relies on hydrogeology, water balance and receiving-water studies that it does not include. AEM's Preface states that the complete Impact Statement will follow in late 2026. We ask the Agency to confirm receipt of Submission 1 and post it on the Registry; to require AEM to file the studies listed below with the Impact Statement; and not to determine under subsection 19(4) of the *Impact Assessment Act* that the required information and studies have been provided, or open public comment, until they are filed and posted. Schedule A gives the source and page for each statement in this letter.

1. Submission 1 is not on the Registry

AEM's Preface describes Submission 1 as an initial submission of nine sections and ten appendices, made in discussion with the Agency, with the complete Impact Statement to follow in late 2026. The documents are dated August 4 to 7, 2026. When we checked on October 1, 2026 we could not find them on the Registry; the project page's latest update was dated August 4, 2026. The time limit runs to March 27, 2027.

We ask that the Agency confirm whether it has received Submission 1, post it and later submissions on the Registry, and tell us whether AEM's website posting forms part of the Agency's own consultation and how the public can comment on it.

2. Submission 1 relies on studies it does not include

The TISG require a three-dimensional groundwater flow model with calibration and sensitivity results, baseline groundwater–surface water interactions, an integrated chemical mass balance, and evidence that mitigation works (sections 8.5.1 and 8.5.2). Section 1.4 lets the Agency require data sets, model input and output files, and laboratory results with detection limits. Submission 1 cites the following studies, but they are not among the ten appendices posted:

- the Hydrogeology Baseline Report (Appendix F-1), the source for groundwater quantity;
- the Hydrogeological Modelling Report and the 2026 conceptual groundwater flow model by SRK;
- the Mine Site and Receiver Water Balance reports (Appendices G-3 and G-4);

- the Mine Site and Receiver Water Quality Modelling reports;
- the receiving-water, mixing zone and diffuser assessments; and
- the Human Health and Ecological Risk Assessment (Appendix Q-1) and the Draft Fisheries Act Offset Plan (Appendix J).

AEM's own concordance table (Appendix A-2) names no location for groundwater–surface water interactions, the quantitative surface water balance, domestic wells and springs, the three-dimensional groundwater model, or the integrated chemical mass balance. Section 3 also gives the same appendix number to different reports in three cases (F-1, G-3 and G-4). We ask the Agency to have AEM correct the labels.

We ask that the Agency require AEM to file these studies with the Impact Statement, with model input and output files, calibration results and station-level data, and to post them on the Registry.

3. The Beaverhouse Lake discharge rests on those studies

Submission 1 changes where treated mine water goes. Operations-phase and active-closure effluent will go to the north side of Beaverhouse Lake through a new pipeline of about 2,000 m with a diffuser, rather than to the Misema River. AEM estimates an average of about 2.9 million m³ a year (about 92 L/s by our conversion), from about 65 L/s in a dry year to about 115 L/s in a wet year. AEM's hydrology report puts the 7Q20 low flow at the lake's outlet at 0.12 m³/s, or 120 L/s. After closure, water from Retention Pond 2 will also reach the lake through Unnamed Stream 5, at about 348,000 m³ a year on average.

AEM says the move rests on updated receiving-water studies, mixing zone assessments, and integrated water balance and water quality forecast modelling, and presents it as a benefit. None of those assessments is in Submission 1. Section 16 says the integrated water management and treatment system needs an industrial sewage works approval from the Province before discharge.

In addition to the matters in our letter of October 2, we ask the Agency to require AEM to provide, before the Impact Statement is determined complete:

- the discharge coordinates, diffuser design and mixing zone dimensions, including at low flow and under ice. Section 3 says the location may still be refined in detailed engineering;
- the proposed effluent limits, the receiving-water criteria used, and predicted concentrations in the lake and at its outlet for mercury, methylmercury, sulphate, ammonia, cyanide species and the hardness-dependent metals;
- the effect of the added flow on lake levels, outflow and the Misema River below the lake; and
- source terms and seepage estimates for tailings and mine rock, and water quality for the post-closure Retention Pond 2 discharge to the lake.

4. Mercury, methylmercury and sulphate need a predictive assessment

Beaverhouse Lake already has high mercury in fish. In 2021–22, 24 Northern Pike, 2 Smallmouth Bass and 32 Walleye exceeded the 0.5 mg/kg Ontario consumption guideline for women of child-bearing age and children. Total mercury in pike, walleye and white sucker was higher there than at any other location sampled, and methylmercury in fish tissue was higher than in any other lake sampled. The lake is low in sulphate, and sulphate can stimulate methylmercury formation in such waters. AEM's treatment reagents include ferric sulphate, sulphuric acid and sodium sulphide. Its metal leaching report finds high sulphate and cyanide and nitrogen species in tailings leachate, lists mercury among the tailings contaminants of concern, and finds mercury leaching from cyanidation-processed tailings equal to or higher than from ore.

We ask that the Agency require AEM to predict the effect of the discharge on lake water and fish tissue, and to file the prediction with the Human Health and Ecological Risk Assessment.

5. Baseline questions in AEM's own data

We ask the Agency to have AEM address the following:

- **Oxygen.** Appendix G-2 describes the lake as well oxygenated. Its own data table records 1.4 mg/L at the deep station BH1D on September 7, 2011, and 0.13 mg/L on August 21, 2012. The second value may be a recording error; please confirm. Please file full oxygen and temperature profiles, including under ice, for the lake basins near the discharge.
- **Hardness.** G-2 calls hardness of 27.4 mg/L moderate. On the usual scale that is soft water. Please confirm which hardness values were used for the hardness-dependent guidelines.
- **Natural versus mining sources.** G-2 attributes aluminum above guidelines in 34% of Beaverhouse samples, and lead at depth, to natural conditions, citing Howard Lake as a reference. Please file the reference-site comparison.
- **Version.** G-2's cover reads Cumulative Baseline Water Quality Report, September 2023, but its page headers read Baseline Air Quality Monitoring Report, September 2025, and its data run to 2024. Please confirm the version and date.
- **Exploration program influence.** Treated effluent from the advanced exploration program is already discharged to the Misema River, and station MX1 sits at that location. Please explain how this discharge and dewatering are treated in the baseline, and file the monitoring data.

6. A comparison of alternatives to a Beaverhouse Lake discharge

TISG section 4.4 requires an alternatives assessment. Section 3 considered only receiving waters within the Misema River system, dismissed a more distant watercourse as giving no incremental water quality benefit without showing the analysis, and found seasonal discharge unattainable because the dry stack tailings facility has no water-holding pond. We are not asking the Agency to prefer one location over another. We ask that the comparison be shown, with the same criteria applied to reduced discharge through recycling and higher treatment performance; storage with seasonal or controlled discharge; the Misema River downstream; and receivers outside the Misema system. We ask that it be redone once the receiving-water modelling is filed.

7. Timing

Once construction begins, the lake and river baselines cannot be measured again. A gap left now stays with the project through operations and after closure. We therefore ask that these materials be filed and posted before the Agency decides the Impact Statement is complete and before public comment opens. If it is faster for the Agency to obtain documents from the Province under the Cooperation Plan, we ask that it do so.

We ask that this letter be posted on the Registry. We would welcome a written response and an opportunity to meet with Agency staff.

Sincerely,

Misema–Blanche River Alliance
Beaverhouse Lake Cottagers Association

cc: Agnico Eagle Mines Limited, Community Relations (relations.upperbeaver@agnicoeagle.com)

Schedule A — Sources for statements in this letter

Page numbers are the printed page where one exists, otherwise the PDF page. All AEM documents are posted at upperbeaver.agnicoeagle.com/documents-downloads/. “IS” means Impact Statement Submission 1.

§	Statement	Source	Page
1	Initial submission of nine sections and ten appendices; the complete Impact Statement will follow in late 2026	IS Preface	p. i
1	Submission 1 documents are dated August 4 to 7, 2026; the Registry project page’s latest update is dated August 4, 2026	AEM downloads page; Registry project page (ref. 82960)	—
1	Time limit extended to March 27, 2027	Registry, Notice of Time Limit Extension (ref. 136)	—
2	Groundwater quantity is reported in Appendix F-1 and the SRK 2026 conceptual groundwater model; neither is posted	IS Section 2	2-15
2	Primary information sources cited but not posted: hydrogeology baseline and modelling reports; mine site and receiver water balance and water quality reports; Draft Fisheries Act Offset Plan; Human Health and Ecological Risk Assessment	IS Section 3	3-34 to 3-35
2	The same appendix number is used for different reports (F-1, G-3, G-4)	IS Section 3	3-34 to 3-35
2	Concordance table names no location for groundwater–surface water interactions, the surface water balance, wells and springs, the three-dimensional groundwater model or the integrated chemical mass balance	IS Appendix A-2 (TISG concordance table)	10 to 12
2	TISG require a three-dimensional groundwater flow model, baseline groundwater–surface water interactions, an integrated chemical mass balance and evidence that mitigation works; the Agency may require data sets and model input and output files	TISG (Registry ref. 83), sections 8.5.1, 8.5.2 and 1.4	53 onward; 6
3	Operations-phase and active-closure effluent to the north side of Beaverhouse Lake by a new pipeline of about 2,000 m with a diffuser	IS Sections 4.11.3 and 4.19.4; Section 3	4-56; 4-92 to 4-93; 3-24 to 3-25
3	Average 2,906,890 m^3/yr (dry 2,066,761; wet 3,619,816)	IS Sections 4.11.3 and 4.11.4	4-56
3	7Q20 low flow at the lake outlet (station M1) of 0.12 m^3/s	IS Appendix G-1, Section 4.4	36
3	Post-closure Retention Pond 2 discharge to Beaverhouse Lake through Unnamed Stream 5: average 348,271 m^3/yr	IS Section 4	4-56 to 4-57
3	Relocation rests on updated receiving-water studies, mixing zone assessments and integrated water balance and water quality forecast modelling; presented as a benefit	IS Sections 4.19.4 and 15	4-92; 15-9

§	Statement	Source	Page
3	Discharge location may be refined in detailed engineering; mixing described as appropriate for aquatic life	IS Section 3	3-25
3	Industrial sewage works approval needed from the Province before discharge	IS Section 16	16-6
4	24 Northern Pike, 2 Smallmouth Bass and 32 Walleye over the 0.5 mg/kg guideline (2021–22); highest total mercury in pike, walleye and white sucker, and highest methylmercury, of any location sampled	IS Appendix I-1	31 to 32
4	Beaverhouse Lake described as low in sulphate	IS Appendix G-2	18
4	Treatment reagents include ferric sulphate, sulphuric acid and sodium sulphide	IS Section 4, Table 4.11-1	4-57
4	High sulphate and cyanide and nitrogen species in tailings leachate; mercury a tailings contaminant of concern; cyanidation gives equal or higher mercury leaching than ore	IS Appendix H-1	8-3 to 8-4
5	Lake described as well oxygenated; hardness of 27.4 mg/L called moderate; aluminum above guideline in 34% of samples, and lead at depth, attributed to natural conditions with Howard Lake as reference	IS Appendix G-2	18
5	Dissolved oxygen of 1.4 mg/L at BH1D on September 7, 2011 and 0.13 mg/L on August 21, 2012	IS Appendix G-2, Appendix C data	Appendix C
5	Cover reads Cumulative Baseline Water Quality Report, September 2023; page headers read Baseline Air Quality Monitoring Report, September 2025; data run to 2024	IS Appendix G-2	Cover; page headers
5	Advanced exploration effluent is discharged to the Misema River; station MX1 is at the discharge location	IS Section 3; Appendix G-2, Table 3-1	3-24; 9
6	Candidate receivers limited to the Misema River system; a more distant watercourse said to give no incremental water quality benefit; seasonal discharge said to be unattainable because the dry stack tailings facility has no pond	IS Section 3	3-24 to 3-25
6	TISG alternatives assessment requirements	TISG (Registry ref. 83), section 4.4	16 to 18
7	Cooperation Plan between the Agency and the Province	Registry ref. 84	—