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) — the Beaverhouse Lake effluent outfall and deficiencies in the engagement record

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 the community engagement reports that Agnico Eagle Mines Limited (AEM) published for the Project between June 2021 and July 2025, against Impact Statement Submission 1 and the Tailored Impact Statement Guidelines (TISG). This letter builds on registry submissions #137 and #138 (May 2026).

AEM's Preface states that the complete Impact Statement will follow in late 2026, within the March 27, 2027 time limit. Sections 5 and 6 and the Record of Consultation (Appendix B) have not yet been filed. We ask the Agency to direct AEM to address the matters below, and to consider them before it determines under subsection 19(4) of the *Impact Assessment Act* that the required information has been provided. Schedule A gives the source and page for each statement in this letter.

1. The effluent outfall was moved into Beaverhouse Lake without public engagement

Section 4.19.4 of the Impact Statement states that the operations-phase effluent discharge location "has been relocated from the Misema River" to the north side of Beaverhouse Lake. Section 4.11.3 describes a new pipeline of about 2,000 m with a diffuser. The water balance projects roughly 2.1 to 3.6 million m³ of treated water a year to the lake during operations, and post-closure drainage from Retention Pond 2 to the lake through Unnamed Stream 5.

The public was told otherwise throughout engagement. The 2021 Detailed Project Description expected discharge to the Misema River below Victoria Creek. At a June 2023 public session, AEM said the discharge would likely be in the Misema River. The discharge alternatives listed for the November 2023 alternatives workshop were Victoria Creek or the Misema River. The June 2025 water workshop described discharge to the Misema River. Section 3.3.2 lists the Beaverhouse Lake discharge location as a topic discussed with five Indigenous Nations, but lists no public event at which it was presented.

The Impact Statement is also inconsistent on this point. Section 4.11.2 and Section 16 refer to the Misema River as the discharge location without distinguishing project phases, while Section 16 also lists an effluent discharge on Beaverhouse Lake. Appendix P-1, the navigable waters report, is dated July 2023 and does not include the Beaverhouse Lake outfall.

In its December 19, 2024 letter to AEM, the Agency named planned effluent discharge, the geographic extent of contaminants, and fish and fish habitat in Beaverhouse Lake among the key issues for its review. Sulphate loading can promote methylmercury formation in sediments and wetlands, so the two must be assessed together. We ask that the Agency:

- require AEM to state the outfall location (coordinates and depth), the diffuser design and the mixing zone extent, and to reconcile the inconsistencies above;
- require predicted post-treatment concentrations at the outfall, with treatment targets, for sulphate, total mercury, methylmercury and the other parameters of potential concern identified in Appendix H-1. AEM's June 2025 workshop presented predicted pre-treatment sulphate of 532 to 1,380 mg/L with no post-treatment value, and Appendix H-1 finds that milling increases mercury leaching from tailings and that methylmercury leaches preferentially;
- assess the effects of the outfall on Beaverhouse Lake within the federal review, rather than defer them to provincial permitting; and
- require AEM to engage Beaverhouse Lake residents and users on the outfall before the Impact Statement is accepted, as TISG sections 4.4 and 5.2 contemplate.

2. AEM has not disclosed how engagement input is recorded, classified or analyzed

TISG section 5.1 requires the Impact Statement to describe the methods used and to provide a record of all engagement efforts, successful and unsuccessful. None of AEM's published engagement reports explains how comments were recorded, coded or analyzed, or names any system beyond meeting tools such as Zoom, Miro and surveys. AEM nonetheless reports totals that imply a tracking system: over 40 meetings since 2021 (November 2022) and over 100 interactions since 2018 (May 2024).

Correspondence shows such a system is in use. The addresses contain codes, and they are found in the Cc line of an email from Amy Danchuk, AEM Community Relations, sent August 29, 2025 at 11:25 a.m. Eastern, with the subject "Upper Beaver_Beaverhouse Lake Stakeholder Meeting_Addition of Site Tour." The email went to 17 non-AEM stakeholder addresses. Its Cc line carried nine addresses on the domain mh.boreal-is.com, eight of them with a code and one without:

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aemontario+PJ-00760-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+EP-01400-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+EP-01401-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+EP-01410-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+EP-01404-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+CG-00201-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+AT-00024-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+CT-00100-outlook_1f36qhwp94asw54@mh.boreal-is.com
aemontario+outlook_1f36qhwp94asw54@mh.boreal-is.com
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Each code pairs a two-letter prefix (AT, CG, CT, EP or PJ) with a five-digit number. The domain belongs to Boréalis, a commercial stakeholder-management platform. Recipients were not told that their correspondence is copied into a third-party system, and AEM has not said what the codes represent.

We ask that Section 5 and Appendix B disclose:

- every system used to record, store or analyze engagement input, including Boréalis, and what each code in the addresses above represents and to whom or what it is attached;
- whether participants are categorized by stance, sentiment, influence or any similar attribute, and the categories used;

- whether automated or AI-assisted processing is applied to comments, categorization or engagement summaries;
- the terms on which AEM retains Transfert Environnement et Société (TES). AEM describes TES as neutral third-party support, yet the document properties of AEM's November 2025 Class EA public notice and its 2024 Advisory Committee Q&A name TES staff as their authors; and
- how participants can see how their own input was recorded.

3. Characterizations of public opinion lack denominators and methods

Several AEM reports summarize public opinion in ways their sources do not support. AEM's November 2022 report to the Township of Gauthier states that 90% of participants at the June 2022 session were satisfied; the June 2022 report shows 30 of 55 attendees surveyed and an average score of 9.3 out of 10. A June 2023 figure of 90% satisfaction refers to the session's format and rests on 16 of 29 attendees. The 2023 online survey's favourable view of AEM rests on 21 respondents, four of them AEM employees, with no stated limitations. The July 2025 Open House report states that a majority expressed no concerns, without stating a method; its PDF was created in July 2026, a year after the event. By contrast, 12 of 20 respondents to a June 2025 workshop poll had no or low confidence in AEM's fish habitat compensation.

We ask that every characterization of public views in the Impact Statement state its denominator, response rate and method, and how many respondents were AEM employees.

4. The processing decision rests on unpublished assessments

Section 3.4.2 rejects processing at AEM's existing mills, including Canadian Malartic, on the basis of engineering assessments that are not published. Section 3.3.2 cites public preference for on-site processing. That preference was recorded at the November 2023 workshop, where the consensus rested on avoiding ore transport. Discharge location was not workshopped, so participants could not weigh where effluent from on-site milling would go. In November 2022 AEM declined to release its internal study, saying the outcome would be shared through the impact assessment.

We ask that AEM publish the assessments relied on in Section 3.4.2, or a summary comparing cost, backfill logistics, footprint and effluent for each option.

5. Beaverhouse Road, the landing, and the alternate road

Section 3.4.9 states that public access is not required within the Project site, that the former boat launch is no longer present, and that an alternate boat launch was established on the south shore in fall 2025 "after extensive consultation." AEM's May 2024 presentation likewise states that it had met and communicated with all private owners in the area about the Fork Lake Road option.

That is not what happened. There was no engagement at all with the cottagers and owners of properties on and around Beaverhouse Lake who use the landing at the end of Beaverhouse Road, or with those who have asserted prescriptive rights over Beaverhouse Road (registry submission #137), on the construction, layout or location of the alternate road. The 2023 public workshops showed a potential alternate route on a map and recorded general views on traffic safety. That is not engagement with the people whose use of the landing and whose rights over the road are directly affected, on where and how the road would be built.

The result shows on the ground. The alternate road and the new landing, established in fall 2025, appear to have been built to satisfy the Agency's review rather than the people who use them. The landing is inadequate for storing boats, and the road is impassable to all but those who own robust vehicles. On September 2, 2026, Beaverhouse Lake property owner Dan Sernasie wrote to AEM that he, his family and friends had got stuck every time they used the Fork Lake road access that year. He described much of the road as very rough, with one section of large, loose rocks in which tires spin ruts, and wrote that using it requires a four-wheel-drive truck, so it cannot safely be used by the general public. Other users report the same. In the same email he noted that AEM had not answered his written questions of July 21 on the mill, tailings and water quality, and had directed him to an open house instead.

AEM's earlier statements point the other way. In November 2022 AEM told the Township of Gauthier it would maintain access to Beaverhouse Road and follow the *Road Access Act* if relocation were needed, and that a relocated boat launch would be no smaller than the existing one and, if anything, improved. In June 2023 it told a public session it would ensure Beaverhouse Lake remains accessible to users; participants at that session proposed reserving Beaverhouse Road for residents and cottagers, with mine traffic on the alternate route. The 2023 findings that an alternate access was acceptable concerned traffic safety. They were not acceptance of any change to existing access rights on Beaverhouse Road.

We ask that the Agency require AEM to:

- identify each engagement activity behind the "extensive consultation" in Section 3.4.9, with dates, participants and the materials shown, and state which of them involved users of the landing or those who have asserted prescriptive rights over Beaverhouse Road;
- engage those users and rights-holders on the construction, layout and location of the alternate road, and on continued access to the landing, before the Impact Statement is accepted;
- show, as part of the alternatives assessment of public and boat-launch access that Section 3.4.9 acknowledges the TISG requires, whether the alternate road and landing give access equivalent to Beaverhouse Road: passable year-round by ordinary passenger vehicles, with adequate boat storage and parking; and
- report in Section 5 how its 2022 and 2023 statements on access, including the boat launch commitment, were honoured.

6. Outstanding engagement commitments

We ask that Section 5 report the status of each of the following:

- a hydrogeology and groundwater baseline report. Submission 1 includes none, although AEM told the public in June 2023 that all baseline reports would be in the Impact Statement;
- public reporting of water-quality exceedances, which AEM said in June 2025 it was working out how to provide;
- the mixing zone details promised at the June 2025 water workshop; and
- the Fork Lake Road access map AEM undertook to send in February 2025.

7. A checkable record

We ask that AEM publish Appendix B in a form participants can check against their own records, and that the Agency invite public comment on it before making the subsection 19(4) determination.

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/.

§	Statement	Source	Page
1	Operations discharge relocated from the Misema River to the north side of Beaverhouse Lake; reasons given	IS Section 4.19.4	4-92 to 4-93
1	New ~2,000 m pipeline with diffuser; construction-phase discharge to the Misema River; operations discharge to Beaverhouse Lake of ~2.1–3.6 million m³/yr; post-closure Retention Pond 2 drainage to the lake via Unnamed Stream 5	IS Sections 4.11.3 and 4.11.4	4-56
1	Treated effluent pumped “to the final discharge location (Misema River)”	IS Section 4.11.2	4-55
1	Discharge to the Misema River (Fisheries Act list); effluent discharge on Beaverhouse Lake (navigable waters)	IS Section 16	16-3; 16-4
1	Beaverhouse Lake discharge location listed as a topic with AAN, BHFN, MFN, TFN and MNO; public events listed without it	IS Section 3.3.2	3-6 to 3-7
1	Discharge alternatives; downstream Misema River rejected for year-round discharge; only locations downstream of cottages considered	IS Section 3.4.7	3-24 to 3-25
1	Navigable waters report dated July 2023, with no outfall	IS Appendix P-1 (WSP)	Title page; Figures
1	Milling increases mercury leaching from tailings; methylmercury leached preferentially; high sulphate in tailings supernatant	IS Appendix H-1 (Lorax, June 15, 2026), Section 8.1	8-3 to 8-4
1	Predicted pre-treatment sulphate 532 to 1,380 mg/L; no post-treatment value	Water Virtual Workshop report, June 19, 2025	PDF p. 58
1	Discharge expected to the Misema River downstream of the Victoria Creek inflow	Detailed Project Description Summary, Dec 2021	—
1	Discharge “likely” at the advanced exploration location in the Misema River	Community Information Session report, June 17, 2023	PDF p. 10
1	Treated effluent discharge alternatives: Victoria Creek or Misema River	Alternatives Workshop report, Nov 14, 2023, Appendix 4	PDF p. 132
1	Key issues: effluent discharge, extent of contaminants, fish and fish habitat in Beaverhouse Lake	IAAC letter to AEM, Dec 19, 2024, Enclosure 1	PDF p. 4
2	Over 40 meetings held since 2021	Gauthier Council Q&A report, Nov 21, 2022	PDF p. 19
2	Over 100 interactions since 2018	Public Information Session report, May 8, 2024	PDF p. 3
2	Nine coded copy addresses on mh.boreal-is.com, in the Cc line	Email from Amy Danchuk (AEM), Aug 29, 2025, “Upper Beaver_Beaverhouse Lake Stakeholder Meeting_Addition of Site Tour” (copy available on request)	Cc line
2	TES described as neutral third-party support	Info Session and Advisory Committee report, Feb 19, 2025	PDF p. 45

§	Statement	Source	Page
2	TES staff named as document authors	PDF document properties: Class EA notice (Nov 2025); Advisory Committee Q&A (2024)	Properties
3	“90% of the participants were satisfied”	Gauthier Council Q&A report, Nov 21, 2022	PDF p. 20
3	55 attended; 30 surveyed; average 9.3/10	Public Information Session report, June 15, 2022	PDF p. 6
3	29 attended; 16 surveyed; 90% satisfied with format	Community Information Session report, June 17, 2023	PDF pp. 2, 15
3	21 respondents; four employed by AEM; perception figures	Key Highlights of Online Community Survey 2023	PDF p. 2
3	“Majority expressed no concerns”; 23 survey responses; PDF created July 22, 2026	Open House & BBQ report, July 19, 2025 (Final-V2)	PDF pp. 7–8; Properties
3	12 of 20 poll respondents with no or low confidence in fish compensation	Water Virtual Workshop report, June 19, 2025	PDF p. 14
4	Existing-mill alternatives incl. Canadian Malartic rejected on engineering assessments	IS Section 3.4.2	3-18 to 3-19
4	Majority consensus for an on-site mill to avoid ore transport	Alternatives Workshop report, Nov 14, 2023	PDF p. 11
4	Internal study not shared; outcome to come through the IA	Gauthier Council Q&A report, Nov 21, 2022	PDF p. 5
5	Public access not required within the Project site; boat launch no longer present; alternate launch established fall 2025 “after extensive consultation”	IS Section 3.4.9	3-26
5	AEM “met and communicated” with all private owners in the area on the Fork Lake Road option	Public Information Session report, May 8, 2024 (presentation slide 34)	PDF p. 52
5	Assertion of prescriptive easement rights over Beaverhouse Road	IAAC registry submission #137, May 3, 2026 (Simon Jutras)	—
5	Stuck every time on the Fork Lake road access this year; large loose rocks; four-wheel drive required; July 21 questions unanswered	Email from Dan Sernasie to Amy Danchuk (AEM), cc AEM Community Relations, Sept 2, 2026 (copy available on request)	—
5	Maintain access to Beaverhouse Road; follow the Road Access Act; relocated boat launch no smaller and, if anything, improved	Gauthier Council Q&A report, Nov 21, 2022	PDF pp. 3, 9
5	Beaverhouse Lake to remain accessible; proposal to reserve Beaverhouse Road for residents	Community Information Session report, June 17, 2023	PDF pp. 11, 14
5	Alternate access found acceptable	Community Information Session report, June 17, 2023; Alternatives Workshop report, Nov 14, 2023	PDF p. 14; PDF p. 16
6	All baseline reports to be included in the Impact Statement	Community Information Session report, June 17, 2023	PDF pp. 9–10
6	Exceedance reporting to the public; mixing zone details to follow	Water Virtual Workshop report, June 19, 2025	PDF p. 7
6	Fork Lake Road access map to be sent	Info Session and Advisory Committee report, Feb 19, 2025	PDF p. 1
—	Complete Impact Statement to follow in late 2026; time limit March 27, 2027	IS Submission 1 Preface; IAAC registry, Ref. 82960	—