



UPPER BEAVER PROJECT

Upper Beaver Gold Project Impact Statement

Section 15: Summary of Benefits



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Acronyms and Abbreviations

AAN	Apitipi Anicinapek Nation
Agnico Eagle	Agnico Eagle Mines Limited
BHFN	Beaverhouse First Nation
ESG	environmental, social, and governance
fVC	federal valued component
IAAC	Impact Assessment Agency of Canada
MFN	Matachewan First Nation
Project	Upper Beaver Gold Project
pVC	pathway valued component
UQAT	Université du Québec en Abitibi-Témiscamingue
TFN	Timiskaming First Nation
TSF	tailings storage facility

15.0 Summary of Benefits

Agnico Eagle Mines Limited (Agnico Eagle) approaches the Upper Beaver Gold Project (Project) with guidance rooted in its commitment to responsible mining, including safe operations, strong workforce and community relationships, and adherence to environmental, social, and governance principles. Its objectives are to develop a high-quality operation that delivers long-term shareholder value, supports employees, and contributes positively to local and regional communities.

Through the Project, Agnico Eagle aims to create economic opportunities through employment, business development, and training, while working with local communities and Indigenous Nations to identify potential effects and inform Project design and assessment. The Project is intended to proceed with environmental protection measures and ongoing engagement to support sustainable outcomes throughout operations and closure.

15.1 Economic Benefits

Metal mining is a key contributor to Canada's economy. In 2024, Canada produced more than 60 minerals and metals valued at \$64.3 billion (Natural Resources Canada 2026). The minerals sector, which includes mining, primary processing, and metal product manufacturing, directly employed 438,000 people in 2024 (Natural Resources Canada 2026). The same source notes that Indigenous Peoples represented 11% of the Canadian mining labour force based on the 2021 Statistics Canada census, placing mining among the leading industries for Indigenous representation.

In 2023, the mining industry directly contributed \$23.8 billion to gross domestic product in Ontario, representing nearly 3% of the provincial total, with indirect contributions adding a further \$8 billion. Capital investments reached \$5.2 billion, supporting employment and economic growth. The broader mining sector employs nearly 150,000 people in Ontario. Indigenous representation in Ontario's mining workforce was 12% from 2023 to 2024, compared with 3% across the provincial workforce overall. Average annual compensation in mineral extraction was \$149,661, nearly double the average across all industries. Ontario's mine supply and service sector employs more than 40,000 people, generating more than \$10 billion annually in supplies and services, and includes more than 1,400 companies (Ontario Mining Association 2026).

A primary benefit of the Project is its expected contribution to the regional economy. Project spending during construction, operations, and decommissioning and closure is expected to stimulate the Ontario economy by generating employment and income across multiple industries. As summarized in Table 15.1-1 and detailed in Appendix N-2, the Project's direct, indirect, and induced effects are estimated to generate \$4.7 billion in additional gross domestic product, 28,110 person-years of employment, \$3.0 billion in labour compensation, and \$2.1 billion in government revenues.

Over the assessment period, the Project's annual direct, indirect, and induced effects are expected to average \$260 million in gross domestic product, 1,560 jobs, \$170 million in labour compensation, and \$120 million in government revenues each year. Figure 15.1-1 presents the estimated annual economic effects over the assessment period.

Workforce demand is expected to peak during construction, when most positions will require skilled trades, operators, and labourers. The Project is expected to prioritize local hiring wherever possible; however, given the current tight labour market (Appendix N-1), workers may be drawn from the region and nearby provinces. Engineering studies completed to date estimate a peak construction workforce of more than 766 people in the final year of construction (Year -1). During operations, the workforce is expected to peak at approximately 797 people when both the open pit and underground mines are operating, and to decline to about 311 workers prior to the end of operations. Hiring strategies may also consider underrepresented groups, as appropriate. Agnico Eagle proposes to recruit first from local Indigenous Nations and communities, followed by regional and provincial labour markets for specialized roles.

Project-related employment opportunities may encourage skilled tradespeople to return to the region, support youth in remaining locally, and attract additional working-age residents. Training, work experience, and business skills developed through Project participation may also be transferable to other sectors, strengthening the regional economy's capacity to benefit from future employment and business opportunities.

Table 15.1-1: Estimate of Economic Benefits

Indicator	Unit	Total	Average per Year
Total Direct, Indirect and Induced Impacts			
Employment	Person-years	28,110	1,560
Total labour compensation	\$ millions	2,970	170
Gross domestic product	\$ millions	4,670	260
Government revenues	\$ millions	2,120	120
Local Area Impacts			
Employment	Person-years	21,270	1,180
Total labour compensation	\$ millions	2,310	130
Gross domestic product	\$ millions	3,260	180
Provincial taxes	\$ millions	1,050	60
Local taxes	\$ millions	190	10

Note:

1. All \$ values are in Canadian dollars in 2024 prices. All values are rounded to closest ten person-years or closest \$10 million.

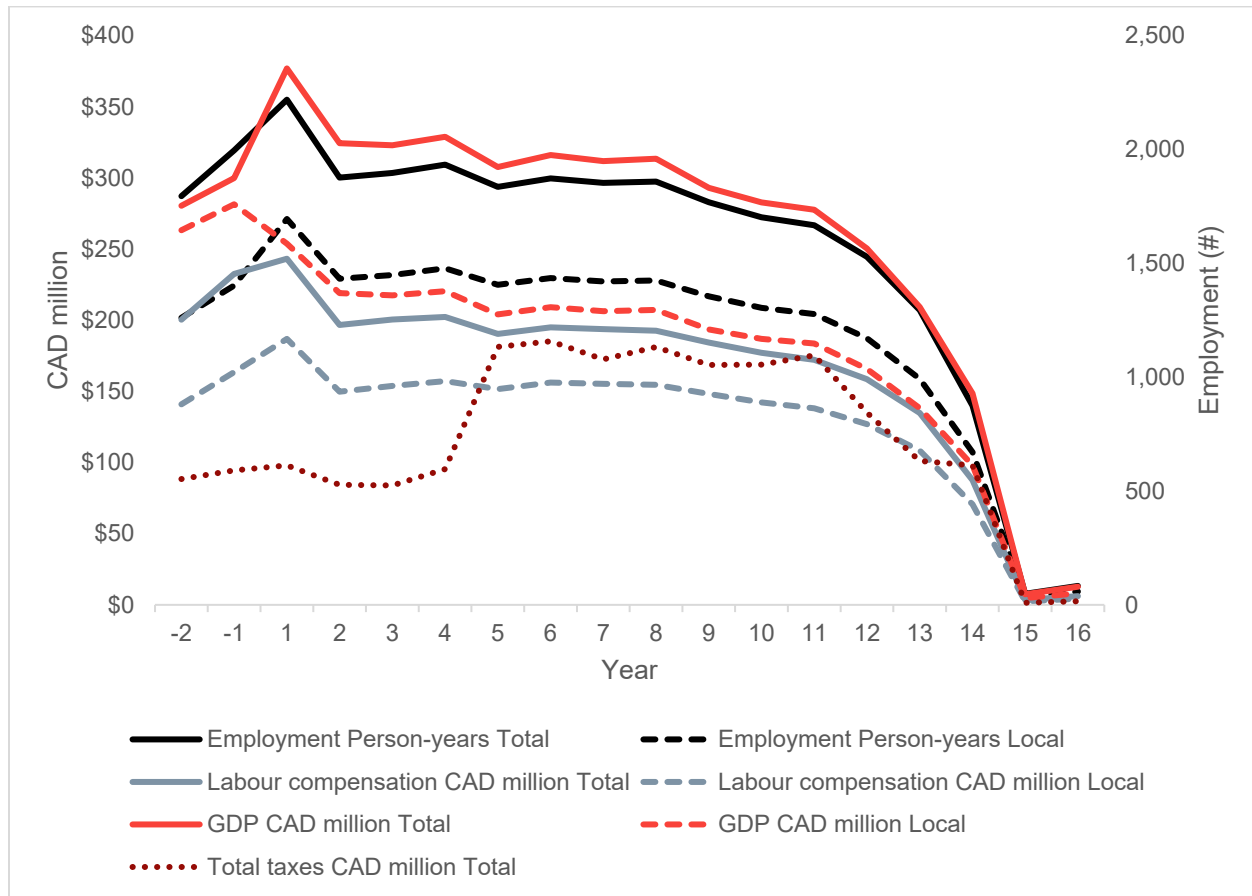


Figure 15.1-1: Estimated Economic Effects per Year

15.2 Social Benefits

Agnico Eagle proposes to develop the Project in a manner that considers all phases of the mine, including construction, operation, and closure, with a focus on meeting community expectations and supporting local and regional benefits throughout the Project lifecycle. Agnico Eagle is committed to operating in a manner that respects Indigenous Nations through meaningful consultation, cooperation, and the development of mutually beneficial relationships. When undertaken with appropriate safeguards and in a spirit of cooperation and consultation, mining can provide meaningful benefits to local communities and Indigenous Nations, including employment, training, and business opportunities. Agnico Eagle will continue to engage with local communities and Indigenous Nations to understand priorities and identify opportunities to support community interests and participation in the Project.

The following key social benefits are predicted as a result of the Project:

- **Worker housing:** a portion of the workforce will come from outside the local community and work on a rotational basis. Agnico Eagle is supporting the development of additional housing in Kirkland Lake for mining operations in the region. This is intended to help reduce potential pressure on existing community services and infrastructure Agnico Eagle may also pursue discussions with the local municipalities to support potential housing improvement initiatives in the region.
- **Increased income:** direct and indirect Project employment is expected to provide a comparatively high income for workers and their families, including for residents of the local Indigenous Nations, local communities and those further away.
- **Purchases of goods and services:** Project purchases is expected to provide increased income and opportunities for expansion and diversification.
- **Fair compensation for workers:** Agnico Eagle is committed to providing competitive compensation and a supportive employment environment that promotes employee well-being, skills development, and career advancement. This includes access to training, professional development opportunities, and workplace programs intended to support employees' health, safety, and overall well-being.
- **Increased labour force and business capacity:** Agnico Eagle will encourage and support training initiatives aimed at enabling residents from local communities and Indigenous Nations to develop the skills required for employment on the Project, particularly with emphasis on the operations phase. Agnico Eagle is committed to working with local suppliers, including Indigenous-owned businesses, to develop capacity to effectively compete and win business while meeting the Project requirements for ethical conduct, due diligence, quality of goods and services, and health and environmental safety. These training opportunities may extend the benefits of the Project beyond the mine life.
- **Support for local initiatives:** Agnico Eagle supports local initiatives and sponsors community-based land use, social and recreational activities to facilitate improvements in overall health and well-being of local communities. Agnico Eagle recognizes health care initiatives are a key priority for local communities, and support in this area to mid-2026 included, but was not limited to:
 - Blanche River Health Foundation Kirkland Lake - \$74,000

- Temiskaming Hospital - \$10,000
- Timmins District Hospital – Dueling Pianos Fundraiser - \$12,200
- Centre de santé communautaire de Kapuskasing - \$14,000
- Matheson Hospital - \$100,000
- Partner Nation Emergency Health Care - \$32,125.

To support Indigenous participation in Project-related employment and economic opportunities, Agnico Eagle will implement workforce practices consistent with its corporate policies governing ethical conduct, sustainability, Indigenous engagement, and inclusive workplaces. These policies establish expectations for ethical behaviour, respect, inclusion, and compliance with applicable laws, and apply to employees and contractors across all Project phases.

Agnico Eagle's approach is guided by its sustainability commitments, which include maintaining a safe and healthy workplace, fostering inclusive environments, and contributing to the social and economic sustainability of communities, while respecting human rights and cultural values.

Inclusive Employment

Agnico Eagle intends to support inclusive employment practices through implementation of workforce policies and programs that:

- Promote equal opportunity, non-discrimination, and respectful workplace conduct
- Support diversity, equity, and inclusion across the workforce.

Agnico Eagle will also implement workforce health and safety systems and related programs designed to support:

- Employee health, safety, and well-being
- Professional development and workforce stability
- Work-life balance within a safe and respectful workplace.

These measures are intended to support a skilled and inclusive workforce and contribute to Indigenous participation and regional workforce capacity.

Education and Training

Agnico Eagle will implement learning, training, and workforce development programs, including:

- Job-specific and safety training
- Apprenticeship and leadership development opportunities, skills development, and upskilling programs aligned with operational needs.

These programs are intended to support workforce readiness and long-term workforce sustainability.

Employee and Community Well-Being

Agnico Eagle will implement programs to support employee well-being, including:

- Occupational health, safety, and wellness programs, including hazard identification, training, emergency response, and continuous improvement



- Employee assistance and support programs that provide confidential mental health and wellness resources
- Cultural awareness and respectful workplace training, including harassment prevention.

These measures are intended to maintain a safe and respectful work environment throughout the Project lifecycle.

Indigenous Engagement Context

Agnico Eagle's workforce-related initiatives are informed by its Indigenous Peoples Engagement Policy, which is based on principles of trust, mutual respect, and transparency and supports relationship-building with Indigenous Nations.

The Project is expected to contribute to the long-term economic and social well-being of Indigenous Nations through employment, training, education, business development, and community partnership opportunities. Consistent with Agnico Eagle's commitment to building mutually beneficial relationships with Indigenous Peoples, the Project will seek to support sustainable community development and capacity building.

Employment and Training

- Creation of direct and indirect employment opportunities for Indigenous community members during construction, operations, and closure phases
- Skills development, apprenticeships, on-the-job training, and career advancement opportunities to support long-term participation in the mining industry and related sectors
- Increased workforce capacity through targeted recruitment and retention initiatives that encourage Indigenous participation.

Education and Capacity Building

- Support for educational initiatives, scholarships, bursaries, internships, and work placement opportunities for Indigenous students
- Collaboration with Indigenous Nations and educational institutions to identify training needs and enhance workforce readiness
- Opportunities to develop technical, professional, and leadership skills that can benefit communities beyond the life of the Project.

Economic Development

- Opportunities for Indigenous-owned businesses to participate in procurement, contracting, and service delivery associated with the Project
- Generation of income and economic activity that can contribute to community priorities and long-term economic resilience
- Support for Indigenous entrepreneurship and business capacity development.

Community Well-Being

- Contributions to community programs and initiatives that support health, wellness, social development, and cultural vitality

- Ongoing engagement and partnership with Indigenous Nations to identify community priorities and opportunities for shared value creation
- Strengthened relationships based on respect, collaboration, and inclusion, supporting positive social outcomes and long-term community well-being.

The Project may support social and economic capacity among participating Indigenous Nations through employment, education, business participation, and community development opportunities.

15.3 Contributions to Knowledge

Consistent with the goal of creating lasting benefits for local communities and Indigenous Peoples beyond the life of the mine, Agnico Eagle has supported the following programs to increase knowledge in the region:

- Environmental baseline studies: extensive baseline investigations were completed to support Project design and the assessment of potential Project-related effects. The results are documented in the Impact Statement and its appendices and are publicly available, with a summary provided in Section 2. In response to comments from Indigenous Nations, the programs were expanded to include enhanced environmental DNA studies.
- Indigenous knowledge studies: Agnico Eagle has also supported local Indigenous Nations, including Matachewan First Nation (MFN), Beaverhouse First Nation (BHFN), Timiskaming First Nation (TFN) and Apitipi Anicinapek Nation (AAN), in the completion of comprehensive Indigenous knowledge and land and resource use studies.

In addition, Agnico Eagle works with universities and research groups in the regions where it operates to develop environmentally friendly, innovative and practical solutions for the entire life cycle of a mine. Much of this work is accomplished by students, contributing to the training of highly qualified personnel who will become the workforce of tomorrow.

The environmental research and development group of Agnico Eagle facilitates interactions between sites and research centres and coordinators to focus research and development on environmentally responsible resource extraction. In addition, Agnico Eagle supports broader research, innovation, and technology development initiatives intended to advance responsible mining practices. Current initiatives include:

- Partnership with the Research Institute in Mine and Environment (RIME), Université du Québec en Abitibi-Témiscamingue (UQAT), and Polytechnique Montréal. The Project is aligned with ongoing Canadian research efforts aimed at improving the environmental performance of mining projects. Research conducted through the RIME, UQAT–Polytechnique advances knowledge related to mine water management, mine waste characterization, acid rock drainage prevention, tailings management, and mine reclamation. These areas contribute to the continued development of industry best practices for responsible mining.
- Partnering in the Natural Sciences and Engineering Research Council of Canada (NSERC) – UQAT Industrial Research chair on Northern Biodiversity in a Mining Context. This research seeks to improve understanding of mining-related effects on biodiversity and support the development of strategies to reduce impacts throughout the

mine life cycle. The Project has the potential to contribute to advancing knowledge of biodiversity management in mining environments through the application and continued development of best practices for mitigating and monitoring effects on northern ecosystems.

- Evaluation of innovative mining technologies, including automated ore sorting and advanced analytics systems, contributes to industry knowledge related to operational efficiency, resource utilization, and environmental performance.
- Assessment of alternative mining methods and equipment, including continuous mining technologies and mechanical cutting systems, contributes to advancing knowledge related to productivity, worker safety, and mining practices.
- Research and evaluation of mine waste valorization opportunities contribute to knowledge related to circular economy principles, waste reduction, and the beneficial reuse of mining by-products.
- Investigation of energy generation, energy management, renewable diesel, and decarbonization initiatives contributes to industry knowledge supporting the transition to lower-emission mining operations.

Together, these initiatives contribute to the development and transfer of knowledge related to responsible mining, innovation, environmental management, decarbonization, and operational efficiency, providing benefits that extend beyond the life of the Project.

15.4 Environmental Opportunities and Benefits

Changes to the Project since its initial presentation in the Initial Project Description and Detailed Project Description during the planning phase of the Impact Assessment have resulted from the following:

- Additional environmental baseline information and other relevant data
- Refinements to engineering design and further definition of the Project, its environmental effects, mitigation measures, and management plans
- Comments received on the Project through engagement with Indigenous Nations and stakeholders.

Many of these changes were informed by extensive engineering and technical studies and were designed to reduce direct and indirect effects on surface water and groundwater, as well as direct, indirect, and incidental effects on fish, fish habitat, and Indigenous Peoples, which are federal valued components (fVCs).

Section 4.19 summarizes the changes made to the Project since it was initially presented to federal and provincial authorities, Indigenous Nations, and the public. Table 15.4-1 summarizes the environmental benefits associated with those changes.

Table 15.4-1: Benefits to the Environment from Changes to the Project

Changes to the Project ⁽¹⁾	Environmental Opportunities and Risk-Reduction Benefits
Mine Rock Stockpile – Relocation of Mine Rock Storage to the Tailings Storage Facility (TSF) Area Refinement of the mine rock storage approach to relocate surface storage from the Advanced Exploration Program area to available capacity within the TSF, following geotechnical investigations indicating unsuitable subsurface conditions in the originally proposed area (Section 4.8).	• Reduced risk of geotechnical instability and associated environmental effects (e.g., erosion, sediment release) during operations and closure. • Improved long-term containment and management of mine rock within an engineered facility (TSF), supporting mitigation of potential effects to surface water and groundwater quality. • Reduced disturbance footprint relative to development of a separate standalone mine rock storage area. • Improved integration of mine waste management systems, supporting more effective monitoring and closure planning.
Overburden Stockpile Haul Road – Realignment and Grade Reduction Relocation of the overburden haul road to the north of the stockpile, maintaining a clear-span crossing of Victoria Creek above the high-water mark, and reducing overall road gradient (Section 4.9).	• Reduced fuel consumption and associated air emissions (e.g., greenhouse gases and air quality parameters) during operations. • Reduced risk of equipment-related incidents due to improved haul road safety and lower gradients. • Maintained protection of aquatic habitat through use of a clear-span crossing that avoids direct in-water works. • Reduced potential for sedimentation and erosion associated with haul road operation through improved design.
Operations Phase Effluent Discharge – Relocation to Beaverhouse Lake Relocation of the effluent discharge outlet to the north side of Beaverhouse Lake based on updated receiving environment studies, water quality guidelines, and integrated water balance and water quality modelling (Section 4.11).	• Enhanced mixing and dispersion of treated effluent due to greater waterbody width and depth, resulting in improved dilution capacity. • Reduced size and intensity of the mixing zone under a range of flow conditions, including low-flow periods. • Improved protection of surface water quality through avoidance of sensitive areas (e.g., spawning habitat, water intakes). • Increased flexibility for water management (including potential for year-round discharge), reducing the need for additional onsite water storage infrastructure.

Changes to the Project ⁽¹⁾	Environmental Opportunities and Risk-Reduction Benefits
	• Reduced overall risk of water management constraints that could otherwise require larger containment systems and associated disturbance.
York Lake Diversion – Optimization of Dyke Configuration Refinement of the diversion system design to reduce the number of dykes from four to three, including removal of one dyke and relocation of another near the outlet of Ava Lake (Section 4.5.1.1).	• Reduced number of water management structures required for the diversion system, resulting in a smaller construction footprint. • Reduced potential for interaction with known archaeological resources through avoidance due to the revised dyke configuration. • Reduced alteration of natural hydrology and associated aquatic habitat by minimizing the number and extent of diversion structures. • Reduced long-term maintenance requirements and associated environmental risks. • Improved constructability and reduced material requirements, resulting in decreased overall disturbance and emissions during construction.

Note:

1. Additional details are provided in the facility descriptions in Section 4; section references provided in brackets.

15.5 Confidence and Uncertainties of Benefits Assessment

Sections 15.1 to Section 15.4 summarize the anticipated benefits of the Project and cross-reference the relevant sections of the Impact Statement that describe the associated Project changes. Uncertainty and confidence are addressed, as applicable, in the effects assessment and significance determinations. Environmental monitoring plans, including those required under provincial regulations, will also incorporate adaptive management. Adaptive management provides flexibility to respond to new circumstances through a planned, systematic process of improving environmental management practices and adjusting monitoring based on observed outcomes. Where relevant, adaptive management approaches are also described in the Impact Statement.

The primary uncertainty affecting the realization of Project benefits relates to overall Project uncertainty rather than to individual valued components. Agnico Eagle intends to develop the Project; however, as with all private mining projects, development remains subject to regulatory approvals and a corporate decision to proceed. That decision will depend in part on the predicted financial return on investment and whether development can be justified to shareholders.

Based on engineering and economic studies completed to date, Project economics are considered by Agnico Eagle to support continued Project advancement. If an unforeseen and substantial change in Project economics occurs during the life of mine, Agnico Eagle may need to close the mine earlier than proposed. In that case, the anticipated Project benefits would be reduced; however, the environment would continue to be protected through implementation of the approved provincial closure plan. Financial assurance would remain with the provincial Crown until closure work is completed to the satisfaction of the Ministry of Energy and Mines. Conversely, if additional economic ore is identified, approvals may be sought under the regulatory framework in effect at that time to extend the life of mine, which would extend the period over which Project benefits are realized.

15.6 Corporate Contribution to Sustainability

15.6.1 Corporate Sustainability Framework

The sustainability approach of Agnico Eagle focuses on responsible mining practices that prioritize health and safety, environmental protection, and contributions to employees, their families, and the communities where it operates. Agnico Eagle aims to create value for shareholders while operating in a safe, sustainable, and environmentally responsible manner, respecting the human rights, cultures, customs, and values of those affected by its activities.

Agnico Eagle's sustainability approach (Agnico Eagle 2025b) is structured around four fundamental objectives:

- Operating a safe and healthy workplace
- Respecting employees and fostering inclusive workplaces
- Protecting the environment and supporting its long-term viability
- Contributing to the social and economic sustainability of communities associated with its operations.

Sustainability is considered throughout all phases of mining activities, from exploration through to closure and reclamation. Agnico Eagle evaluates potential impacts, risks, and opportunities associated with its activities across the full lifecycle of its projects and operations.

Agnico Eagle's key sustainability commitments and initiatives include:

- **Health and safety:** Agnico Eagle emphasizes maintaining a safe and healthy workplace through the implementation of health and safety management systems, training programs, and initiatives aimed at supporting workforce well-being and safety performance.
- **Environmental management:** Agnico Eagle implements environmental management practices focused on managing and mitigating potential effects on the environment, including water stewardship, tailings and waste management, biodiversity, and environmental compliance.
- **Climate and energy:** Agnico Eagle reports on energy use and greenhouse gas emissions as part of its environmental performance, including initiatives related to energy and climate considerations.



- Community engagement and Indigenous relations: Agnico Eagle undertakes engagement with communities and Indigenous Nations through consultation, community relations activities, and programs intended to support local and regional socio-economic conditions.
- Governance and business conduct: Agnico Eagle reports on topics related to governance, including business ethics, transparency, and sustainability compliance as components of the overall sustainability framework.
- Monitoring and reporting: Sustainability performance is tracked and disclosed through annual reporting, including the monitoring of environmental, social, and governance performance indicators across operations.

Agnico Eagle incorporates climate-related considerations within its sustainability reporting framework, including the assessment and reporting of greenhouse gas emissions and energy use as part of broader environmental performance disclosure.

15.6.2 Sustainability Reporting

A comprehensive sustainability report is published annually by Agnico Eagle, detailing its environmental, social, and governance (ESG) performance across its global operations. The 2025 Sustainability Report (Agnico Eagle 2025a) is publicly available through the Agnico Eagle corporate website and provides information on sustainability performance and key topics.

The sustainability framework presented in the 2025 Sustainability Report is organized across key thematic areas that reflect Agnico Eagle's approach to responsible mining. These include:

- Health, safety and wellness: Agnico Eagle reports on health, safety and wellness through management systems, initiatives, and performance reporting focused on workforce safety and well-being.
- Environment: Agnico Eagle reports on environmental management through topics such as water stewardship, tailings and waste management, biodiversity, and environmental compliance, with a focus on managing and mitigating environmental effects.
- Energy and climate: Agnico Eagle includes energy use and greenhouse gas emissions within its environmental reporting, addressing climate-related considerations as part of overall sustainability performance.
- Community engagement and Indigenous relations: Agnico Eagle reports on engagement with local communities and Indigenous Nations, including consultation and community relations activities associated with its operations.

In addition to these thematic areas, the report includes sections addressing governance topics such as business ethics, transparency, and sustainability compliance as part of the overall ESG framework.

Agnico Eagle also publishes sustainability performance data, including Global Reporting Initiative and Sustainability Accounting Standards Board indices, which support transparency and comparability of ESG reporting.

The 2025 Sustainability Report forms part of a broader set of ESG disclosures prepared by Agnico Eagle that provide stakeholders with information on sustainability performance across its operations.

15.6.3 Social Performance Management System

Agnico Eagle's social performance approach is described primarily through its Sustainability Report and supporting corporate policies, which together outline how social performance is managed as part of the broader ESG framework. Information is reported on community engagement and Indigenous relations, and how these are considered alongside other sustainability topics.

The Sustainability Report outlines Agnico Eagle's approach to managing sustainability-related topics across a series of defined thematic areas, including community engagement and Indigenous relations, as part of its broader ESG framework. Social performance topics are described alongside environmental and governance considerations. The social performance functions through a combination of engagement processes, performance monitoring, and integration within corporate governance and reporting structures. The approach includes the following key elements:

- Community engagement and Indigenous relations: Agnico Eagle engages with communities and Indigenous Nations through consultation and community relations activities associated with its operations.
- Environmental and social monitoring and reporting: Performance is tracked and disclosed through monitoring and sustainability performance indicators across operations.
- Integration within ESG reporting: Social performance topics are presented alongside environmental and governance topics within the overall sustainability reporting framework.

Agnico Eagle's Sustainability Report outlines a range of social and governance topics that collectively form its approach to social performance, including:

- Health, safety and wellness
- Community engagement and Indigenous relations
- Governance topics such as business ethics and sustainability compliance
- Monitoring and reporting of social and environmental performance.

These components are supported and implemented through corporate policies and engagement practices that apply across Agnico Eagle's operations and throughout the project lifecycle.

For the Project, Agnico Eagle has identified and engaged with a range of local and regional stakeholders and Indigenous Nations that may have an interest in, or be affected by, the Project. These include local municipalities, community members, and Indigenous Nations such as BHFN, MFN, AAN, TFN, and the MNO.

Engagement activities relevant to these communities include:

- Ongoing stakeholder and Indigenous engagement through meetings, workshops, and information sharing
- Provision of Project information and opportunities for input into baseline studies and project design

- Collaboration with Indigenous Nations on Indigenous knowledge studies and participation in field programs
- Continued consultation to identify and address concerns and potential effects.

Agnico Eagle's Sustainability Report identifies mechanisms for tracking community engagement feedback and issues as part of its broader engagement and reporting framework. For the Project, engagement processes provide opportunities for stakeholders and Indigenous Nations to raise questions, concerns, and feedback through formal and ongoing consultation activities. This feedback is documented and considered as part of project planning and regulatory processes.

15.7 Consideration of Sustainability Principles in the Impact Statement and Project

Sustainability, as defined in the Tailored Impact Statement Guidelines, is *"the ability to protect the environment, contribute to the social and economic well-being of the people of Canada and preserve their health in a manner that benefits present and future generations."*

The sustainability principles developed for the purpose of implementing the *Impact Assessment Act* as defined in Impact Assessment Agency of Canada (IAAC; 2021) are as follows:

- Consider the interconnectedness and interdependence of human-ecological systems
- Consider the well-being of present and future generations
- Consider positive effects and reduce adverse effects of a designated project
- Apply the precautionary principle and consider uncertainty and risk of irreversible harm.

Guiding questions have been provided by IAAC (2021) for each of these principles, to be considered in preparation of an Impact Statement. Table 15.7-1 provides a listing of these guiding questions, with a description of how they were considered in the preparation of this Impact Statement.



Table 15.7-1: Key Considerations in Applying Sustainability Principles to Impact Statement Preparation

Guiding Sustainability Principles ⁽¹⁾	Guiding Questions ⁽¹⁾	Summary Response	Key Related Impact Statement Section ⁽²⁾ , Table or Figure
Principle 1: Consider the interconnectedness and interdependence of human-ecological systems	What are key environmental, health, social and economic components that should be included in the system?	The Impact Statement includes valued components which reflect the natural and human environment and are of particular concern or value to participants that may be affected by the Project. The selection of valued components for the Impact Statement (Section 7.3) is based in part on issues important to participants, and reflect the interconnectedness of human-ecological systems, aligned with the updated regulatory framework related to federal jurisdiction. The federal Impact Assessment process is intended to prevent or mitigate substantial adverse effects within federal jurisdiction. As such, the valued components were characterized as: fVCs, which are valued components within federal jurisdiction as guided by key issues identified by IAAC (2024); or pathway valued components (pVCs), which are valued components that provide a pathway for direct or indirect effects to fVCs.	Sections 7.3; Table 7.3-1; Figure 7.3-1
	Has Indigenous knowledge informed the selection of valued components that make up the human-ecological system?	The selection and refinement of valued components has been informed by Indigenous Nations and consideration of Indigenous knowledge, where provided. This includes identification of components of cultural and ecological importance, which informed the inclusion and characterization of specific VCs and pathways in the assessment.	Sections 7.3, 8, 9 to 11
	What are the interactions between the environmental, health, social and economic components of the system?	The assessment of each pVC and fVC identifies direct, indirect, and incidental interactions with Project components and activities. These interactions may result in a pathway to a potential effect on the valued component, which is further analyzed after the application of mitigation measures. The linkages between valued components are identified in the introduction to the assessment section for each valued component.	Section 8.1.5, 8.2.5, 8.3.5...to 8.12.5, 9.5, 10.5 and 11.1.5, 11.2.5 and 11.3.5 Section 8.1.1, 8.2.1, 8.3.1...to 8.12.1, 9.1, 10.1, 11.1.1, 11.2.1 and 11.3.1.
	What are the potential pathways?		
	What are the direct and indirect interactions?		
	How do interactions change over time?	The assessment considers all Project phases (construction, operations, and closure) and evaluates how linkages and interactions may change over time.	Sections 8 to 11
	How are cumulative effects considered?	The approach used for assessing the potential for cumulative effects from the Project in the Impact Statement, is consistent with the requirements of the Policy Framework for Assessing Cumulative Effects under the <i>Impact Assessment Act</i> (IAAC 2023b). Per the Policy, cumulative effects are changes to the environment or health, social and economic conditions resulting from the changes from a project, combined with other physical activities that have been or will be carried out.	Section 12
	Has Indigenous knowledge informed the analysis?	Indigenous knowledge that has been shared with Agnico Eagle has informed the understanding of baseline conditions, the assessment of alternatives, the identification of pathways of potential effects, and the assessment of potential Project effects. Non-confidential Indigenous knowledge is included in the Impact Statement, where appropriate.	Sections 8 to 11
	Will the system, or parts of the system, recover or adapt to change caused by the project?	The assessment of changes resulting from the Project considers all Project phases, including closure. A conceptual closure plan is provided in the text of the Project Description (Section 4.18) and considers measures intended to mitigate Project development and end land use for the Project Area after mining and reclamation.	Section 4.18
Principle 2: Consider the well-being of present and future generations	How do communities define well-being? What elements are valuable to them?	Community well-being is characterized by social, economic, cultural, and health-related conditions that influence quality of life. Elements include access to employment, housing, services, cultural continuity, land use, and community cohesion. These elements were identified through desktop research, census data, service provider interviews where available, engagement, and available Indigenous Knowledge and land use reports.	Sections 8.12, and 11.3
	Are there existing community well-being plans?	Municipal and Indigenous community plans, where available, were reviewed to inform baseline conditions and priorities related to well-being, including health, infrastructure, and economic development.	Sections 8.12, and 11.3

Guiding Sustainability Principles ⁽¹⁾	Guiding Questions ⁽¹⁾	Summary Response	Key Related Impact Statement Section ⁽²⁾ , Table or Figure
	Have diverse groups and different perspectives been included in the definition of well-being?	The assessment considers diverse populations, including Indigenous Peoples, women, youth, Elders, and vulnerable groups, using available data and engagement inputs to inform the understanding of potential effects.	Sections 8.12, and 11.3
	What are the potential effects to the elements described as valuable?	The potential effect is a change in regional community well-being, reflected in changes to the social and economic conditions that shape quality of life. Project-related changes in factors such as access to services, employment opportunities, and traditional resources may interact to affect community well-being. These interactions are assessed both individually and in combination for each community.	Sections 8.12, and 11.3
	How many future generations were considered and how were their interests defined and included?	The assessment addresses intergenerational effects by considering how Project-related changes could influence the transfer of knowledge, cultural practices, and land stewardship across generations.	Sections 8.12, and 11.3
	What are the long-term effects on well-being? Will the effects change over time?	Long-term effects include sustained employment during operations, and potential service and housing pressures during construction and early operations. Effects are expected to diminish post-closure, with land reclamation providing future opportunities.	Sections 8.12, and 11.3
	How will these long-term effects affect future generations?	Long-term effects are expected to include both pressures (e.g., on services) and benefits such as employment opportunities that build transferable skills. Reclamation commitments are designed to support the Project site returning to a safe and productive condition and supporting cultural and economic use after closure.	Sections 8.12, and 11.3
	What are the likely futures that would be foregone with the Project in place?	In the absence of the Project, potential regional employment and income opportunities would not occur. With the Project, alternative land uses in the Project Area would be deferred until closure and reclamation, at which time, the site is planned to return to safe and productive use.	Section 4.18
	Have you proactively sought out Indigenous knowledge to inform the analysis?	Where available, Indigenous knowledge was shared confidentially and integrated into defining valued well-being elements, identifying effects, and characterizing intergenerational concerns.	Sections 8.12, and 11.3
	Has scientific and community knowledge informed the analysis?	Both quantitative data (e.g., Census data, service statistics) and qualitative insights (e.g., community reports, Indigenous knowledge studies) informed the analysis of effects on Indigenous Peoples.	Sections 8.12, and 11.3
Principle 3: Consider positive effects and reduce adverse effects of the designated Project	Are additional mitigation measures required to mitigate effects within federal jurisdiction?	Mitigation and enhancement measures are summarized for the fVC in consideration of the identified potential effects of the Project.	Sections 9.6, 10.6, 11.1.6, 11.2.6 and 11.3.6
	Have positive effects been identified?	Positive effects have been identified, assessed and summarized as economic and social benefits, and environmental opportunities.	Section 15
	Can positive effects be maximized?		
	Does the direction of the impact (i.e., positive or adverse) shift between different groups and sub-populations?	The assessment recognizes that benefits and adverse effects may be experienced differently among communities and groups, depending on proximity, participation, and existing conditions. The benefits at an individual level are primarily provided to those who choose to participate in the Project; however, there are local and regional benefits which can be expected to have a broader indirect benefit that may extend to other individuals and businesses in the region.	Section 15
	Do some benefit while others do not?		
	Are there particular strengths or vulnerabilities in the potentially affected communities that may influence impacts?	The assessment recognizes that community characteristics shape how Project effects are experienced. Strengths such as cultural continuity, land-based knowledge, harvesting practices, intergenerational knowledge transfer, and social cohesion can support resilience and the ability to realize benefits. At the same time, these characteristics may increase sensitivity to disruption, including housing and service pressures, infrastructure limitations, and reduced access to culturally important sites. These considerations, informed by socio-economic data, service provider input, and Indigenous knowledge where available, are incorporated throughout the assessment.	Section 11.3.6



Guiding Sustainability Principles ⁽¹⁾	Guiding Questions ⁽¹⁾	Summary Response	Key Related Impact Statement Section ⁽²⁾ , Table or Figure
	Do the impacts cause regional inequities?	Benefits are expected to be greatest for those directly participating in Project activities, while broader economic benefits extend at regional and provincial scales.	Section 15
	Do the near-term benefits come at the expense of further disadvantages for future generations?	Reclamation of the Project site in accordance with the provincial <i>Mining Act</i> as summarized in the conceptual closure plan. The primary goal of the closure plan is to establish a site that is physically, chemically and biologically stable, and to rehabilitate the Project footprint to a productive and natural state, as practicable. Financial assurance is required for the reclamation activities, prior to construction. In addition, the financial assurance is retained, and the lands will not revert to the provincial Crown until the Ministry of Energy and Mines is satisfied. In addition, where required under the <i>Fisheries Act</i> , financial assurance in the form of a letter of credit will be provided to Fisheries and Oceans Canada to support the implementation and maintenance of measures associated with any authorization (e.g., habitat offsetting or compensation works).	Section 4.18
Principle 4: Apply the precautionary principle and consider the uncertainty and risk of irreversible harm	What uncertainties are associated with the sustainability analysis?	The assessment of each valued component includes a description of the application of the conservative approach to managing uncertainties in modelling and data availability. In addition, a summary of the level of confidence is provided for each assessment of residual changes.	Section 8.1.2, 8.2.2, 8.3.2...to 8.12.2, 9.2.4, 10.2.4, 11.1.2, 11.2.2 and 11.3.2 Section 8.1.9, 8.2.9, 8.3.9...to 8.12.9, 9.8.1, 10.8.1, 11.1.9, 11.2.9 and 11.3.9
	Is there high uncertainty around mitigation effectiveness? If so, consider the need or benefit for reducing uncertainty through mechanisms such as adaptive management plans.	The majority of the mitigation measures proposed have been proven effective when used in similar activities and projects. A follow up monitoring program is proposed and uses adaptive management as needed to manage higher levels of uncertainty.	Section 17
	Is there a risk of irreversible harm? What measures have been taken to address these risks?	Agnico Eagle's approach to mine closure is to incorporate rehabilitation into Project design and begin it as early as practical through progressive reclamation, while integrating site-specific knowledge throughout the mine life cycle. The overall objective is to restore affected lands, once mining ends, to a naturalized and productive condition capable of supporting plant, wildlife, and fish communities, as well as other appropriate land uses, even if those conditions differ from baseline.	Sections 4.18
	Has Indigenous knowledge informed the identification of uncertainties and risk? If so, how?	Indigenous knowledge shared by local Indigenous communities informed preparation of the Impact Statement, including the assessment of uncertainty, confidence in predicted changes, and, where applicable, significance determinations.	Section 8.1.9, 8.2.9, 8.3.9...to 8.12.9, 9.8.1, 10.8.1, 11.1.9, 11.2.9 and 11.3.9

Notes:

1. Per IAAC (2021).

2. Where, ...is shown in the last column, the same subsection number repeats in the Impact Statement with the section number changing.

15.8 Application of the Precautionary Principle

The precautionary principle is referenced in the mandate of the *Impact Assessment Act*. The precautionary principle states that “*where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.*”

Examples of how the Precautionary Principle has been applied for the Project are demonstrated through the approach to:

- Impact assessment
- Risk mitigation and control
- Site rehabilitation
- Community engagement and consultation.

15.8.1 Impact Assessment

Multiple years of environmental baseline investigation and engineering field investigations have been completed to support the design of the Project. This information has been used to reduce the level of scientific uncertainty. Environmental and engineering studies that support the Impact Statement use a reasonable, conservative approach as described in Section 8 through Section 11, where appropriate. These scientific studies were supported with information obtained through consultation and engagement with local communities and feedback from individuals, as well as Indigenous knowledge at a broader scale, shared with Agnico Eagle through confidential Indigenous knowledge reporting. Agnico Eagle will continue to apply shared Indigenous knowledge during all phases of the Project, including consideration of this information during assessment of any future Project changes not currently envisioned.

The *Impact Assessment Act* requires the consideration of alternatives to the designated project and alternative means of carrying out the designated project that are technically and economically feasible. The assessment of alternatives (Section 3) uses a reasoned process to identify the preferred alternative carried forward into the project description (Section 4). As described in Section 3, the viable alternative means identified through a screening process were assessed for natural environment, human environment and technical and economic criteria and indicators. The evaluation criteria and indicators selected could reasonably be applied to the assessment of alternatives to the Project and alternative means for the Project, consistent with the identified valued components for the Project. One of the identified criteria was whether the alternative was supportive of net-zero greenhouse gas emissions by 2050, a sustainability goal. The alternatives analyses considered whether the effects to Indigenous Peoples could vary for diverse population groups. Criteria and indicators related to gender-based analysis plus were not established, as they would not be differentiating for the alternative means that remained after screening. If differentiating advantages or disadvantages for population groups were identified, they are noted in the text.

Conservative assumptions have been generally applied throughout the Impact Statement to overstate rather than understate potential adverse effects and not emphasize positive benefits. A management and follow up program (Section 17) is proposed to confirm the conservatism of the assessment and detect unintended consequences so that appropriate corrective action can be taken.

15.8.2 Risk Mitigation and Control

The Project design incorporates best available technologies that are economically achievable to minimize environmental harm, including emissions control. These measures are shown in the site plan and described in Section 4. They include, but are not limited to, the following:

- A robust, multi-faceted tailings management approach supported by design reviews from industry-leading experts
- Water treatment and recycling technologies to reduce water use and prevent the release of untreated contact water to the environment
- An integrated water management and treatment system that repurposes required facilities to maximize benefit and reduce environmental effects, while using industry-leading technology to improve effluent quality and respect regulatory requirements.

15.8.3 Project Site Rehabilitation

Agnico Eagle is committed to delivering safe and responsible closure, in consultation with stakeholders and Indigenous Nations, supporting land use transitions that seek to deliver lasting outcomes. Early planning, supported by regular updates throughout the mine life, is key to successful closure and transition. Agnico Eagle plans for potential closure-related costs and liabilities and has processes in place to optimize mine reclamation and remediation activities. Closure plans are developed during the early phases of a project and updated at key stages to include improvements in knowledge over time. Agnico Eagle engages with its workforce and affected communities prior to closure to support workforce transition planning and to discuss considerations related to future land use. During operations, progressive reclamation activities are advanced, and long-term environmental monitoring are developed and implemented, which are key aspects of responsible mine closure. This approach supports the identification and implementation of progressive reclamation opportunities, with the objective of reducing impacts and maximizing post-mining benefits where practicable.

As indicated in Section 4.18, the *Mining Act* requires that a Closure Plan be certified to the Mine Rehabilitation Code by qualified professionals, prior to disturbance associated with the mining project being initiated, and that financial assurance be provided to the provincial Crown (government) before any substantive development takes place such that funds are in place to carry out the described activities. The Closure Plan considers post-closure monitoring programs to confirm the sustainability of the rehabilitated site. The financial guarantee is intended to cover the cost of site rehabilitation, so the work is carried out even if the company becomes insolvent and does not burden society.

The overall closure objective is to reclaim the affected lands to a naturalized and productive condition when mining ceases, that is capable of supporting plant, wildlife and fish communities, and other applicable land uses which will be informed by engagement with local Indigenous communities. Agnico Eagle intends to initiate the reclamation of affected lands as early as practical (progressive reclamation) with the objective of gaining and incorporating site specific knowledge and information through the mine life cycle, to support the success of final closure.

15.8.4 Community Engagement and Consultation

Agnico Eagle has taken a proactive approach to public and Indigenous Nation participation, as described in Section 5 and Section 6 and detailed in Appendix B. Responses have been provided to comments and concerns raised. Agnico Eagle has sought to communicate clearly and transparently about the potential effects of the mine through consultation and engagement activities and in this Impact Statement.

Consultation and engagement will continue throughout the life of mine. Although Agnico Eagle intends to maintain positive relationships, a mechanism is in place to track and respond to complaints and to resolve potential conflicts with local communities, as described in Section 6.

By applying a precautionary approach to mine design, Agnico Eagle aims to minimize the environmental and social effects of mining while supporting a more sustainable future for both the industry and the communities that rely on its resources.

15.9 References

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