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Kugluktuk

Bathurst Inlet
Kingaok

Bay Chimo
Umingmaktok

Cambridge Bay
Ikaluktutiak

Gjoa Haven
Okhoktok

Taloyoak

Kugaaruk

Kelli Gillard
Manager, Project Monitoring
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
X0B 0C0

July 4th, 2024

**Re: Review of AEM's 2023 Annual report for Hope Bay Project Certificate
NIRB No. 009.**

Dear Kelli Gillard, the KIA has reviewed AEM's 2023 Annual Report for the Hope Bay project to the NIRB.

1) Compliance Monitoring:

The KIA's Framework Agreement (FA) and Inuit Impact and Benefits Agreement (IIBA) with Agnico Eagle Mines Limited (AEM). the cover terms and conditions of NIRB Project Certificate 009 and the NWB Type A water licenses.

The Framework Agreement is a confidential agreement between KIA and AEM that supersedes and replaces all previous contractual arrangements between both parties. Section 3.1 of the FA covers Terms and conditions of land use license and reporting.

Appendix A of Section 3.1 of the Framework Agreement specifies the details of annual reporting by AEM to the KIA, which is summarized as follows:

AEM is to provide an annual report to KIA providing details of its operations under any land use License, Advanced Exploration Lease and/or Commercial Lease covering the location and operations area of lands affected, and the nature of facilities and equipment at these sites. In addition, AEM is to provide details of progressive reclamation or closure activities undertaken during the year and details of all permits, licenses, and authorizations from other regulatory bodies or agencies that are required for operations.

This annual report is to provide information on:

- Ground disturbances including land use activities for camps, infrastructure, equipment, winter roads and trails.
- Fuel and Chemical storage including Chemicals of Potential Concern inventory (COPC), fuel and chemical usage, and spill records.
- Drilling programs, locations, and methods.
- Water use and effects on water.



- Wildlife interaction, data logs, and summaries.
- Waste disposal, waste management practices, inventory of waste on site, and inventory of hazardous materials or non-combustible waste removed from site.
- Closure and reclamation progress associated with waste management, drilling, and ground disturbance along with associated costs.
- General information on annual inspection activities by staff and other agencies and their results, community consultations, future exploration work plans, submissions to NIRB, NWB, or NPC or other regulators related to mining activity, archaeological sites and burial grounds, and any incidents of storage or possession of alcohol and drugs on site.

AEM has provided the KIA with the **Hope Bay Project 2023 Annual Report for KIA Framework Agreement** in accordance with Appendix A to Schedule 3.1 of the Framework Agreement. This report is separate from the **Hope Bay Project 2023 Annual Report to the NIRB**.

The socio-economic impact of the project on affected communities of Nunavut is covered by the IIBA, which is summarized here.

Inuit Impact and Benefits Agreement (IIBA) – Summary.

The Hope Bay Project went into Care and Maintenance in March 2022. During Care and Maintenance, Schedule “D” Training and Education Opportunities and Schedule “E” Employment do not apply. All the other Schedules still apply, including Schedule “A” Implementation Committee. Instead of four Implementation Committee meetings annually, there must be at least one meeting annually.

A summary of 2022 Hope Bay Project IIBA implementation results was provided in the September and October 2022 IIBA Manager Reports to the KIA Board. This included a comprehensive review of Inuit employment at the Hope Bay Project since 2015. In October 2023, Agnico Eagle Mines presented to the KIA board and delegates at the KIA AGM about their 2022 employment and training numbers.

The Inuit Environmental Advisory Committee had two meetings in 2023, one in March and one in August. The environmental monitoring program at the Hope Bay Project site and the fisheries offsetting program near Cambridge Bay have continued as planned regardless of the Project going into Care and Maintenance. They discussed the fisheries offsetting plan, Roberts Lake Outflow monitoring, Cambridge Bay fisheries offsetting measures, and caribou identification to better understand what species are in the Hope Bay mine area and what time of year they are around.

The IEAC toured site facilities including the waste management area, and the Height of Land survey areas on March 24, 2024.



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The IEAC toured the fish fence of the fisheries offsetting work at Ikaluktutiak outflow on August 8-9, 2023.”

Internal Report on September Hope Bay Inspection – August 22 to 25, 2023

Summary

The inspection of the Hope Bay mine site and facilities was conducted from August 22 to 25 as per established inspection schedule. Guy Dufour of Agnico Eagle Mines LTD. (AEM-TMAC) had accompanied John Roesch and Katrina Hatogina of KIA on the inspection. Sixty-three (63) site components out of 117 components were inspected in accordance with KIA’s established schedule.

Overall, the mine site is being maintained in good condition while in care and maintenance. Roberts Bay, the Airstrip and Access Road, Doris North, Waste Management Area, Quarry #2, Secondary Road, the TIA area, Windy Road and Windy Lake Camp, and Madrid North were inspected. On-going exploration is being done at Doris North around Patch Lake. Boston Camp is being refurbished and cleaned up for use in exploration activities.

There has been 9 locations where brine has spilled from drill casing. Two are right along Windy Road and seven others are at drilling location around Patch Lake. These spills were reported to the NT-NU 24-hour spill report line on July 25, 2023. The brine spill has damaged tundra vegetation in all of these locations. Sue Bishop of ABR Environmental Research & Services has been contracted by AEM. Remediation experimentation should be done on three spills based on remediation work done at the Orbit 25 brine spill by Boston Camp.

The jetty is being lowered to accommodate the offloading of cargo by barge by other companies.

The Roberts Bay discharge pipe is in good condition and the diffuser was reinstalled. Ocean water is recirculated and discharged in the winter to prevent the discharge pipe from freezing in the winter. The airstrip’s north apron requires repair of cracks on its west side.

The Crushing and Milling Plant is shut down and is being used as a workshop for helicopter maintenance. The tarp covering the Primary Jaw Crusher is completely gone and needs to be replaced.

The North Dam is in good condition with no cracking at the crest or water leakage at its toe. Boulders with rods have been installed for stability monitoring. The new water treatment plant has been constructed and is being commissioned.



Extensive remediation has occurred at Windy Camp with almost all of the buildings gone. ARD test stands need to be rebuilt. Some have been weakened over time.

Complete revegetation has occurred in the vegetation dieback zones at Boston Camp. There is also significant vegetation regrowth at the Orbit 25 brine spill burn.

Compliance Status

2) Effects of Monitoring:

a) Whether the conclusions reached by AEM in the Hope Bay 2023 Annual Report to the NIRB are Valid.

KIA's consultants in the areas of wildlife, aquatic sciences, and geotechnical engineering reviewed the Hope Bay 2023 Annual Report to the NIRB and the following documents:

- Appendix A. Concordance Table.
- Appendix B. Site Layouts.
- Appendix C. Status Update and Project Certificate Commitments.
- Appendix D. Compliance Monitoring Reports.
 - Appendix D-1. Q1-Q3 2023 Atmospheric Compliance Monitoring Program Report-Doris and Madrid Project.
 - Appendix D-2. 2023 Wildlife Mitigation and Monitoring Program Compliance Report.
 - Appendix D-3. Socio-economic Monitoring Program Report.
 - Appendix D-5. 2023 Aquatic Effects Monitoring Program Report.
 - Appendix D-6. 2023 Aquatic Effects Monitoring Program – Aquatic Response Plan for Phytoplankton Biomass.
- Appendix E. Windy Camp Reclamation Summary.
- Appendix F. Hope Bay Project 2023 Effluent Monitoring Reports.
- Appendix G. Updated Monitoring and Management Plan.
 - Appendix G.1: Care and Maintenance Plan.
 - Appendix G.2: Emergency Response Plan.
 - Appendix G.3: Human Recourses Plan.
 - Appendix G.4: OPEP.
 - Appendix G.5: QA/QC Plan.
 - Appendix G.6: Shipping Management Plan.
 - Appendix G.7: Spill Contingency Plan.
 - Appendix G.8: Waste Rock, Ore, and Mine Backfill Management Plan.
 - Appendix G.9: Water Management Plan – Doris-Madrid.



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Overall, most of our consultants find AEM's conclusions in the 2023 Annual Report are basically valid, with partial and complete agreement on several project Terms and Condition, and commitments.

AEM has presented adequate information to demonstrate the Hope Bay Project has complied with most of the project certificate terms and conditions to most of our consultants, whereas KIA's wildlife consultant considers two project certificate conditions to be non-compliant.

Our wildlife consultants comments and recommendations concerning these project certificate conditions will be presented along with our other consultants in the next section of our response to NIRB.

- b) Any areas of significance requiring further supporting information or changes to the monitoring program, which may be required.**

Hope Bay 2023 Annual Report to NIRB

KIA-NIRB-01

Review Comment Number	KIA-NIRB-01
Subject/Topic	Water levels in tailings impoundment area (TIA), warming thermistors in North Dam, updated trigger action response plan (TARP) in TIA Operations, Maintenance and Surveillance (OMS) Manual
References	Agnico Eagle 2023 Hope Bay Annual Report App K.3 Doris TIA AGI Agnico Eagle 2023 Hope Bay Annual Report App L.7 TIA OMS Manual
Summary	<ul style="list-style-type: none"> Water levels continued to increase in the Doris TIA in 2023 until the additional water treatment capacity was commissioned in the second half of the year, allowing for increased water withdrawal from the TIA and discharge to Roberts Bay. Select thermistor readings within the core of the North Dam have indicated warming ground temperatures within the core of the dam in response to the elevated water levels. The Trigger Action Response Plan (TARP) related to water levels in the TIA was updated in 2023. In comparison to the previous version of the TARP, alert levels are not triggered until higher water levels have been observed.



Detailed Review Comment	<ul style="list-style-type: none"> • The North Dam was designed as a water retaining structure. The dam has a central frozen core with a secondary upstream Geosynthetic Clay liner (GCL) (Section 2.3.1, 2023 Doris TIA AGI). The maximum allowable temperature within the core is -2 °C. • In the previous version of the OMS manual (Rev 6 issued by Agnico Eagle March 2023) the Normal Operating Water Level (NOWL) of the reclaim pond in the Doris TIA was identified as <31.5 masl and the critical condition level was identified as > 33.5 masl. The first level of the TARP was initiated at reclaim pond water levels above 31.5 masl. • In the 2024 update to the OMS manual (Rev 7 issued by Agnico Eagle March 2024), the NOWL was increased to < 34 masl and the critical condition level was increased to >35 masl. The first level of the TARP is initiated at reclaim pond water levels above 34 masl. • As per Section 4.9 of the 2023 Doris TIA AGI report, the water levels peaked at 33.05 masl on August 25, 2023 before reducing to 32.15 masl by the end of 2023. • Monitoring of ground temperature cables installed in the North Dam in 2023 indicated warming of select beads within the upstream area of the dam core approaching maximum allowable ground temperatures within the core. • Based on the observed geothermal performance of the North Dam in 2023 it appears that elevated water levels (33 m asl and higher) may result in ground temperatures warmer than allowed for in the design of the facility. It is unclear if the recent updates to the Doris TIA OMS manual which allow for water levels up to 34 masl before initiating the first level of the TARP will support desired performance of the North Dam.
Recommendation/ Request	<ul style="list-style-type: none"> • Provide rationale for the adjusted alert levels included within the updated OMS manual related to water levels in the TIA reclaim pond. • Are the adjusted alert levels included in the OMS manual update supported by thermal modelling results for the North Dam demonstrating the ability to achieve allowable ground temperatures within the core and foundation materials at these elevated water levels? • Provide comment on whether the geothermal response to the elevated TIA reclaim pond water levels observed in the warming temperatures within the core of the North Dam support the adjusted alert levels. • What is the current water level within the TIA and what are the projected water levels in 2024 given the care and maintenance (C&M) status of the mine?
Importance	High



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KIA-NIRB-02

Review Comment Number	KIA-NIRB-02
Subject/Topic	Outstanding sample results from Quarry 2
References	Agnico Eagle 2023 Hope Bay Annual Report App. H – Doris and Madrid Waste Rock, Quarry and Tailings Monitoring Report
Summary	<ul style="list-style-type: none"> Quarry 2 was approved for use as construction material under the Project Certificate No. 003. In 2023, one blast occurred at Quarry 2, whereby the rock was primarily mafic metavolcanics (1a) and fibrous actinolite was not present. Samples were collected; however, not all results were presented as part of annual reporting.
Detailed Review Comment	<ul style="list-style-type: none"> As part of Quarry Management Plan, annual routine monitoring involves collection of two samples for submission of total sulphur (S) analysis. The total S for the coarse fraction was 0.09 %S and 0.14 %S for the fine fraction. Given the fine fraction total S surpassed the criterion of total S > 0.10 %S; both the coarse and fine samples were submitted for acid-base accounting (ABA), with the fine sample also submitted for trace elements and shake flask extraction (SFE) testing. The results were expected from the reporting laboratory in April 2024 (Section 7.2.2.2 of Appendix H), which was after the submission of the NWB report. These results will be provided as an addendum.
Recommendation/Request	<ul style="list-style-type: none"> Provide the results of the additional test work and if further actions are required based on these findings.
Importance	Low

KIA-NIRB-03

Review Comment Number	KIA-NIRB-03
Subject/Topic	Further support for proposed evapoconcentration mechanism
References	Agnico Eagle 2023 Hope Bay Annual Report App. H – Doris and Madrid Waste Rock, Quarry and Tailings Monitoring Report
Summary	<ul style="list-style-type: none"> At the Madrid Waste Rock Storage Area (WRSA), chloride concentrations were higher at the Contact Water Pond (CWP)



	<p>relative to the sumps in the area, which was interpreted to be associated with evapoconcentration.</p> <ul style="list-style-type: none"> Data presented does not support this rationale.
Detailed Review Comment	<ul style="list-style-type: none"> At the Madrid North WRSA, there are four sumps and a CWP. The CWP is located downgradient of Sumps 1 to 3; however, these sumps do not drain directly to the CWP. Sump 4 is located downstream of the CWP, to capture seepage bypassing containment at the CWP (Appendix H, Figure 9-7). Section 10.5 (of Appendix H) concludes that the higher chloride concentrations at the CWP (i.e., relative to the sumps) is associated with evapoconcentration. Given that these sumps are in proximity to the CWP, it is not clear why evapoconcentration would have a measurable impact to the CWP and not these other ponded features. As well, in Section 9.2.4.1 (of Appendix H), the highest chloride concentrations in 2023 were noted at Sump 2 and it was stated that these elevated chloride concentrations of chloride were due to contact water draining from underground waste rock toward Sump 2 and, to a lesser extent, to Sump 1. In this section, it was stated that the high chloride concentrations at Sump 2 were due to less flow (i.e., less dilution). Therefore, a separate possibility could be that high chloride concentrations at CWP are associated with the contribution of contact water from Sump 2 to the CWP and/or seepage from flow pathways that interact with underground waste rock present at the Madrid North WRSA.
Recommendation/Request	<ul style="list-style-type: none"> Provide additional support regarding the likelihood that evapoconcentration is occurring at the CWP and not the nearby sumps.
Importance	Moderate

KIA-NIRB-04

Review Comment Number	KIA-NIRB-04
Subject/Topic	Elevated total suspended solids (TSS) concentrations at the TIA pond
References	<p>Agnico Eagle 2023 Hope Bay Annual Report App. D1 – Water Licence Monitoring Data (2AM-DOH1335)</p> <p>Agnico Eagle 2023 Hope Bay Annual Report App. L4 – Water Management Plan</p>



Summary	<ul style="list-style-type: none"> Review of water quality data at TL-1 shows total suspended solid (TSS) concentrations that are greater than the Metal and Diamond Mine Effluent Regulations (MDMER) standards.
Detailed Review Comment	<ul style="list-style-type: none"> Underground mine water is pumped from a settling sump system to a water treatment plant (WTP) on surface designed to provide TSS removal (i.e., meeting MDMER standards) from the effluent stream prior to final discharge to Roberts Bay. Agnico is constructing an additional WTP to treat TSS, in the vicinity of the reclaim pond at the TIA. When this additional WTP is operational, both untreated and treated effluent will be sampled on a weekly basis to assess the performance of the WTP (Appendix L4, Section 3.2.7). Annual reporting indicated construction and commissioning of this new effluent WTP (EWTP) at the TIA was completed in July 2023. A description of the EWTP treated volumes were not documented in this year's annual report. Samples are collected monthly at TL-1, which is at the TIA reclaim pipeline. Discharge of water to Roberts Bay is to meet MDMER standards (Appendix L4, Section 5.4, Table 5-4). Results of discharge volumes in 2023 to Roberts Bay, and associated water quality data at TL-1, were reported in Appendix D1 (Tables D1-20 and D1-21). Water was discharged from the TIA to Roberts Bay in May to December 2023, for a total volume of 1,167,571 m³ (Table D1-20). During these months, Table D1-20 states no exceedances of discharge criteria were observed. Review of the water quality results at TL-1 through 2023 shows that TSS concentrations regularly exceeded the maximum authorized concentration in a grab sample (i.e., >30 mg/L); specifically, eight of 12 samples in 2023 exceeded 30 mg/L, which included the samples collected in January to May, July, November, and December. All samples except two months (i.e., June and October) also exceeded the maximum authorized monthly mean concentration of 15 mg/L.
Recommendation/ Request	<ul style="list-style-type: none"> Agnico Eagle to provide clarification if the EWTP actively treated water from the TIA in 2023. If the EWTP was operational and treated TIA pond water, the water quality of the treated effluent should be provided in accordance with its Water Management Plan (Appendix L4; Section 3.2.7). If water from the TIA, as represented by the water quality measured at TL-1, was discharged to Roberts Bay without treatment, Agnico Eagle is requested to provide further information regarding elevated TSS concentrations.



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Importance	High
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KIA-NIRB-05

Review Comment Number	KIA-NIRB-05
Subject/Topic	Lowering of the Roberts Bay jetty
References	Summary of Project Activities in 2023
Summary	The lowering of the Roberts Bay jetty was completed in August 2023, it included excavation to reduce the grade.
Detailed Review Comment	The jetty was excavated in August 2023 to optimize sealift operations.
Recommendation/ Request	It is KIA's understanding that the jetty is used for commercial and fuel deliveries. Please clarify how the material from the excavation was reused at the Site, considering that the excavated material has the potential to be contaminated.
Importance	Low

KIA-NIRB-06

Review Comment Number	KIA-NIRB-06
Subject/Topic	Doris Lake
References	Appendix D5: Hope Bay Project: 2023 Aquatic Effects Monitoring Program Report 3.3.3 Turbidity
Summary	Increase of turbidity levels at Doris Lake.
Detailed Review Comment	Figure 3.3-3B clearly indicates an increase in the turbidity levels in Open-Water samples, with the 2023 value being above the benchmark value. A modest increase in turbidity can also be observed in under ice samples in 2023, even if the value is still below the benchmark level.
Recommendation/ Request	Agnico should identify the activities that have the potential to increase the turbidity values and take corrective mitigation measures to prevent exceedance of the benchmark level.



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Importance	Moderate
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KIA-NIRB-07

Review Comment Number	KIA-NIRB-07
Subject/Topic	Monitoring the TIA
References	Appendix G1: Care and maintenance Plan 2.7.1 Pipelines, Ponds, and Collection Sumps
Summary	The TIA is mentioned throughout the paragraph.
Detailed Review Comment	Paragraphs mentioning the TIA due not specify which section is being referred to, the saline or contact water sections.
Recommendation/ Request	When mentioning the TIA, the section of the TIA which Agnico is referring to (i.e., saline or contact water) should always be included.
Importance	Low

KIA-NIRB-08

Review Comment Number	KIA-NIRB-08
Subject/Topic	Monitoring the TIA
References	Appendix G: Updated Monitoring and Management Plans 3.2.5 Tailings Impoundment Area
Summary	The sampling protocol for the TIA should be updated to acknowledge the presence of two different sections (Saline or contact water).
Detailed Review Comment	<p>The following water quality samples will be collected from the TIA:</p> <ul style="list-style-type: none"> • At the reclaim pipeline at TL-1 on a monthly basis; • Quarterly samples at the process plant in the tailings slurry line, TL-5; • Monthly samples from the solids component of mill effluent at TL-6; • Tailings sent underground will be sampled at TL-7 on a monthly basis. <p>The water level in the pond is monitored and measured daily year-round.</p>
Recommendation/ Request	Water levels and water quality within the TIA should be assessed for both the non-saline section (between dike and North Dam) and the saline section (between dike and South Dam) of the TIA.
Importance	Moderate



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KIA-NIRB-09

Review Comment Number	KIA-NIRB-09
Subject/Topic	Mine Water
References	Appendix G: Updated Monitoring and Management Plans 3.2.6 Mine Water
Summary	Mine Water management.
Detailed Review Comment	A talik is expected to be encountered during the Doris Mine development, groundwater inflows are expected to have a water quality dominated by high salinity (chloride). Groundwater will be collected in underground sumps and pumped to the surface, from where it will be treated and discharged to Roberts Bay, either directly, or via the Tailings Impoundment Area (TIA). It is not clear how the saline water will be treated considering that the water treatment plan is designed to remove Total Suspended Solids (TSS) and it is not expected to be effective in removing Chloride
Recommendation/Request	The saline water should be discharged into the saline section of the TIA.
Importance	Moderate

KIA-NIRB-10

Review Comment Number	KIA-NIRB-10
Subject/Topic	Contact Water
References	Appendix G: Updated Monitoring and Management Plans 4.1.2 Contact Water
Summary	The resulting tailings will be pumped via pipeline and deposited in the TIA.
Detailed Review Comment	The TIA is comprised of two areas: Saline and contact water. It is not indicated where tailings will be deposited between the two areas.
Recommendation/Request	Please confirm if tailings will be deposited in the contact water section only.
Importance	Low



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KIA-NIRB-11

Review Comment Number	KIA-NIRB-11
Subject/Topic	Appendix G: Updated Monitoring and Management Plans
References	Figures
Summary	Missing Figures.
Detailed Review Comment	<ul style="list-style-type: none"> • Figure 1 Water Management Schematic-Doris • Figure 2 Water Management Schematic- Madrid • Figure 3a Doris SNP Sample Stations • Figure 3b Doris SNP Sample Stations • Figure 4 Madrid SNP Sample Stations • All the figures are missing.
Recommendation/ Request	Please include the missing monitoring and management plan figures.
Importance	Low

KIA-NIRB-12

Review Comment Number	KIA-NIRB-12
Subject/Topic	Lowering of Roberts Bay Jetty
References	2023 Annual Report, 3. Summary of Project Activities in 2023, 3.1 Doris, 4. 2024 Workplan; 7.7 Marine Environment Revised Term and Condition No. 19. Appendix D-5 - 2023 AEMP Annual Report
Summary	Lowering of the Roberts Bay jetty was completed in August 2023, which included excavation to reduce the grade and install structural concrete blocks/gate. No new jetty was installed, rather maintenance on the existing infrastructure and there was no new impact.
Detailed Review Comment	No construction information is provided for the lowering of the jetty, so it is unknown whether any in-water work was required, or how sedimentation or rock fall into the marine environment was prevented. The AEMP does not list jetty construction as an activity that occurred in 2023. Section 7.7 indicates no construction occurred in the marine environment, but details of the construction plan are still needed.
Recommendation/ Request	Provide a construction plan or summary of construction activities and mitigation measures for the Roberts Bay jetty.



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Importance	Low
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KIA-NIRB-13

Review Comment Number	KIA-NIRB-13
Subject/Topic	Water discharge to Roberts Bay
References	2023 Annual Report, 3. Summary of Project Activities in 2023, 3.1 Doris. 7.7 Marine Environment Revised Term and Condition No. 13, No. 16
Summary	MDMER compliant underground and TIA water were discharged to Roberts Bay. An acute lethality test failure occurred, stopping the discharge for 2 weeks, even though MDMER limits were not exceeded.
Detailed Review Comment	The water quality of underground and TIA water discharged to Roberts Bay is not presented.
Recommendation/Request	Provide water quality variable results for underground and TIA water discharged to Roberts Bay, as well as threshold MDMER levels and threshold levels for fish.
Importance	Moderate

KIA-NIRB-14

Review Comment Number	KIA-NIRB-14
Subject/Topic	Aquatic Effects Monitoring Plan
References	2023 Annual Report, 7.6 Freshwater Environment, Appendix D-5 - 2023 AEMP Annual Report
Summary	The change observed in Chlorophyll a concentrations over time in Doris Lake was considered to be due to natural variability and/or regional non-Project-related factors.
Detailed Review Comment	The reason for this determination of natural variability is not provided in Section 7.6 of the Annual Report.
Recommendation/Request	Provide the scientific reasoning for the determination of natural variability that is stated in the AEMP.
Importance	Low



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KIA-NIRB-15

Review Comment Number	KIA-NIRB-15
Subject/Topic	Unknown Brine Spill Risk
References	2023 Annual Report Main Document, Table 6.3-1. Summary of Reportable Spills in 2023, p. 6-6 (p. 129 of PDF)
Summary	The proponent has not provided sufficient information to determine whether the spill of drill brine on July 24, 2023 presents a residual risk to the aquatic environment. AEM is requested to provide information to clarify whether a residual risk to the aquatic environment is present.
Detailed Review Comment	AEM identified a spill of drilling bring that impacted a significant area of tundra: 3776 m2. AEM described follow-up activities which appear appropriate. However, the risk posed by the spill to the aquatic environment is not clear. These brines by design contain high concentrations of chloride which is a conservative ion; it will not break down in the environment over time. Additional information is required to determine whether any nearby aquatic environments are at risk as a result of residual brines being flushed during precipitation events and/or freshet.
Recommendation/Request	AEM to provide the following information: <ul style="list-style-type: none"> Distance between spill and the nearest aquatic receiving environment. What steps have been taken to contain the residual brines spilled onto the tundra to mitigate ongoing impacts to the environment? <ul style="list-style-type: none"> Have the impacted soils been excavated? Are erosion and sediment controls in place to prevent further mobilization of impacted soils beyond the 3776 m2 impacted area?
Importance	Moderate

KIA-NIRB-16

Review Comment Number	KIA-NIRB-16
Subject/Topic	TIA Monitoring
References	Appendix G.9: Water Management Plan – Doris-Madrid, 5.3 Monitoring Plan, Table 5-1 Water monitoring at Doris Site (Adapted from the Hope Bay Quality Assurance and Quality Control Management Plan)



Summary	Water quality sampling in the saline portion of the TIA is not specified in Table 5-1. It is important to understand the water quality both in the saline and fresh contact water sections of the TIA to inform inputs to the final effluent that will be discharged to Roberts Bay.
Detailed Review Comment	<p>AEM has developed a segmented TIA to manage both contact water as well as saline water from the underground. The TIA is divided by the interim dike constructed in 2023 <i>“allowing the segregation of saline and non-saline water. Saline water (mine water) is stored between the interim dike and the South Dam of the TIA; no saline (contact water) is stored between the interim dike and North Dam.”</i> (Section 3.2.5 Tailings Impoundment Area). However, water monitoring at the Doris site as outlined in Table 5-1 does not indicate separate monitoring for both the contact water portion of the TIA and saline water storage is planned.</p> <p>Water sampling is also not specified proximal to the dam separating the fresh and saline sections of the TIA leaving some ambiguity as to whether diffusion is occurring through the dam separating the two.</p>
Recommendation/ Request	<p>The monitoring plan outlined in Table 5-1 should specify that samples will be collected in each of the sections of the TIA – the fresh and saline contact water ponds. Water quality monitoring for the saline portion of the pond should duplicate requirements for TL-1 that occur in the freshwater portion of the pond, and specifically include water column profiles that include temperature, dissolved oxygen, pH and conductivity.</p> <p>Toxicity testing is not recommended for the saline pond as acute lethality is expected for undiluted groundwater. Water quality samples collected in the contact water portion of the TIA should be updated to include water quality samples proximal to the interim dam to better evaluate diffusion through that structure.</p>
Importance	High

KIA-NIRB-17

Review Comment Number	KIA-NIRB-17
Subject/Topic	Closure/post Closure Updates
References	Appendix G.9: Water Management Plan – Doris-Madrid, 6.1 Water Management at Closure and Post-Closure
Summary	The water management plan has not been comprehensively updated to include the saline water pond within the TIA. The plan should be updated accordingly.



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Detailed Review Comment	Section 6.1 of the Water Management Plan has not been updated to include consideration of highly saline groundwater stored in a portion of the TIA nor for the presence of the interim dam.
Recommendation/ Request	Please update this section to provide additional detail regarding management of waters through the TIA at closure with consideration of the saline water stored therein for the remaining life of the project.
Importance	Low

KIA-NIRB-18

Review Comment Number	KIA-NIRB-18
Subject/Topic	QA/QC Regulations
References	Appendix G.5. QA/QC Plan; Table 1-1
Summary	The caption of Table 1-1 implies that the QA/QC Plan is regulated but the table does not refer to any regulations.
Detailed Review Comment	The caption of Table 1-1 reads “List of federal and territorial regulations governing the Quality Assurance and Quality Control Plan”. However, none of the 3 documents listed in the table are regulations.
Recommendation/ Request	Please correct the title or information contained within Table 1-1.
Importance	Low

KIA-NIRB-19

Review Comment Number	KIA-NIRB-19
Subject/Topic	Potential effects on chlorophyll-a and phytoplankton
References	Appendix D.6: Hope Bay Project: 2023 Aquatic Effects Monitoring Program – Aquatic Response Plan for Phytoplankton Biomass; Section 4.1.1
Summary	A potential project-related effect on phytoplankton is not accounted for.
Detailed Review Comment	The text states that “ <i>Project-related effects to phytoplankton biomass would be manifested through changes to the nutrient availability, water temperature, or hydrological regime as the Project would not have influence on light/solar radiation availability.</i> ”



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	In fact, changes to concentrations of dissolved (e.g., dissolved organic carbon) or particulate (e.g., total suspended solids) substances from project activities would affect water clarity (which influences light availability to phytoplankton). This can affect phytoplankton growth and biomass, but also the photo acclimation status of the phytoplankton (i.e., the ratio of chlorophyll-a to biomass), so also has implications for the use of chlorophyll-a as a surrogate for phytoplankton biomass.
Recommendation/ Request	The text should be revised to recognize the potential for project activities to affect phytoplankton (and the relationship between chlorophyll-a and phytoplankton biomass) via changes in water clarity.
Importance	Low

KIA-NIRB-20

Review Comment Number	KIA-NIRB-20
Subject/Topic	Errors in hydrology data
References	Appendix B: 2023 Hydrology Compliance Monitoring Summary (an appendix of Appendix D.5: Hope Bay Project: 2023 Aquatic Effects Monitoring Program Report); Table 3-8 (p. 13) and Table 4.1-1 (p. 14)
Summary	There are errors in Tables 3-8 and 4.1-1.
Detailed Review Comment	Table 3-8 lists under-ice volumes for the monitored lakes with units of cubic millimeters; clearly either these units or values cannot be correct. Table 4.-1 lists total precipitation values for the Doris hydrometric station based on only 3 months of data; the values are thus completely unrepresentative of annual totals and should not be listed at all.
Recommendation/ Request	Please provide accurate information in Tables 3-8 and 4.1-1.
Importance	Moderate

KIA-NIRB-21

Review Comment Number	KIA-NIRB-21
Subject/Topic	Trend analysis methodology
References	Appendix D.5: Hope Bay Project: 2023 Aquatic Effects Monitoring Program Report; Section C.2.2



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Summary	The trend analysis methodology is very complex and cannot readily be understood based on the text in Section C.2.2.
Detailed Review Comment	<p>In section C.2.2.1 it is stated that linear mixed effects (LME) modelling is used to test for trends. The model form is expressed as “$y = \text{Lake} + s(\text{Year}) + \text{Lake} * s(\text{Year})$”. The subsequent text explains that <i>“Time effects were modelled using natural cubic regression splines to allow for non-linearity...The regression model is linear in the new variables, $hk(x)$, and usual LME or Tobit approaches for model fitting and inference may be used. The splines are represented as linear combinations of basis functions evaluated at x and the number of basis functions is dependent on the number of knots (K) chosen.”</i></p> <p>The description of the approach (quoted above and elsewhere) is complex, to the point of being opaque to a non-statistician, and it is difficult to understand how slopes are estimated and their significance (difference from zero and from that for Reference Lake B) tested. It is not clear why a linear model is used when ultimately the fits of curves to the data are not linear. It would seem to this reviewer that, by definition, the year-to-year trend lines should be linear, and nonlinear effects (e.g., seasonality) would be modelled using splines (if necessary), perhaps with a generalized additive mixed model (GAMM), which would make the logarithmic data transformations unnecessary (as a normal distribution of the residuals would not be assumed).</p> <p>Lake is included as a factor in the mixed effects model – the text reads <i>“The main sources of variation can be broken down into two components: yearly effects that affect the measurements in all lakes and effects that affect each lake individually.”</i> This ignores seasonality, but furthermore, it is unclear, given that the analysis was performed only on data from Doris Lake, what lakes are actually included in the model.</p>
Recommendation/ Request	Please use a more conventional, intuitive, and/or transparent approach for trend analysis, or include an improved plain-language description that is comprehensible to non-statisticians.
Importance	High

KIA-NIRB-22

Review Comment Number	KIA-NIRB-22
Subject/Topic	Reporting of censored effluent data



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References	Appendix F: Hope Bay Project 2023 Effluent Monitoring Reports; Table 3.1 and Table 3.2
Summary	Censored effluent concentrations (“non-detects”) are handled in an unconventional (if not incorrect) manner.
Detailed Review Comment	Non-detects should be presented as less than the MDL, not as the MDL (e.g., <2.0 not 2.0 if below MDL of 2.0). Moreover, substituting the MDL for non-detects for relative percent difference calculations biases the RPD downward (compared to the conventional substitution with 1/2 MDL).
Recommendation/ Request	Non-detects should be presented as less than the MDL and where substitution is necessary replaced with half the MDL.
Importance	Moderate

KIA-NIRB-23

Review Comment Number	KIA-NIRB-23
Subject/Topic	Doris diversion construction schedule
References	Annual Report (Main Document); Section 4.1 Appendix G.1: Care and Maintenance Plan; Figure 4.1
Summary	The timeline for construction of the Doris CPRT diversion berm and/or ditch is not presented.
Detailed Review Comment	“Construction of Diversion Berm and/or Diversion Ditch at Dorist CPRT [Crown Pillar Recovery Trench]” is listed as an activity planned for 2024 in the main report. However, in Figure 4.1 of the Care and Maintenance Plan, it is not depicted when this activity will take place in 2024.
Recommendation/ Request	Please revise Figure 4.1 to include the schedule for the diversion ditch/berm.
Importance	Low

KIA-NIRB-24

Review Comment Number	KIA-NIRB-24
Subject/Topic	Annual update for Wildlife Mitigation and Monitoring Plan
References	Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)



	<ul style="list-style-type: none"> Project Certificate No. 003, Revised Term and Condition No. 27 Project Certificate No. 009, New Term and Conditions No. 19, No. 20 <p>Agnico Eagle, Hope Bay Project, Proponent's Response to Comments Received on the NIRB 2022 Annual Report (September 2023)</p> <ul style="list-style-type: none"> KIA-NIRB-01, KIA-NIRB-03, KIA-NIRB-04, KIA-NIRB-06
Summary	<p>Revised Term and Condition No. 27 of Project Certificate No. 003 states that the Wildlife Mitigation and Monitoring Plan (WMMP) must be updated annually. Agnico Eagle did not submit an updated WMMP in 2024 (i.e., as part of the 2023 NIRB Annual Report). The KIA expected to review an updated WMMP with changes that Agnico Eagle committed to during the 2022 NIRB Annual Report review process.</p>
Detailed Review Comment	<p>In Section 5 of the 2023 NIRB Annual Report, with respect to three revised or new Terms and Conditions (TC) related to the Wildlife Mitigation and Monitoring Plan (WMMP), Agnico Eagle states that they updated the WMMP in January 2023 and that <i>"This plan was still valid throughout 2023, and no updated Plan is provided at this time."</i></p> <p>However, the Doris North Project Certificate (PC) No. 003, Revised TC No. 27 states that <i>"The Proponent must also submit an updated plan on an annual basis which much [sp] also be approved by NIRB."</i> By not submitting an annual update, Agnico Eagle is non-compliant with this TC. Furthermore, in response to several KIA review comments on the previous 2022 NIRB Annual Report, Agnico Eagle had committed to WMMP updates, including:</p> <ul style="list-style-type: none"> KIA-NIRB-01: Agnico Eagle <i>"will update the WMMP in the next cycle to reflect details of [composter] operations outlined in the recommendation."</i> KIA-NIRB-03: Agnico Eagle <i>"will correct the discrepancies noted by the KIA in the 2024 submission of the updated WMMP (plan) as well as the annual 2023 WMMP Report."</i> KIA-NIRB-04: <i>"The WMMP (plan) will be updated to accurately reflect the reporting design for helicopter activity at site"</i> (also reiterated in response to KIA-NIRB-06) and <i>"The WMMP will be updated to correct the status of the new track surveys in the next cycle of annual reporting (i.e., in 2024)."</i>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please provide an updated WMMP Plan for the current cycle of annual reporting (i.e., 2024). This updated WMMP Plan should include any commitments made by Agnico Eagle to the KIA and



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	other reviewers (as applicable) during the 2022 Annual Report reviews.
Importance	High

KIA-NIRB-25

Review Comment Number	KIA-NIRB-25
Subject/Topic	Major revisions needed for OPPP/OPEP
References	<p>Agnico Eagle, Hope Bay Project, Oil Pollution Prevention Plan (OPPP) and Oil Pollution Emergency Plan (OPEP) (March 2024)</p> <ul style="list-style-type: none"> Sections 1.3, 2.3, 3.4.5, 3.7.1 Schedules 5, 7, 9 Tables 5, 6 Document Control (p. iii) Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024) Section 3.1 Project Certificate No. 003, Revised Term and Conditions No. 20, No. 33 Project Certificate No. 009, New Term and Condition No. 52 Agnico Eagle, Hope Bay Project, 2022 NIRB Annual Report (April 2023) Section 3.1.1 <p>Agnico Eagle, Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 3.1
Summary	<p>It does not appear that the OPPP/OPEP has been meaningfully updated since 2020 by TMAC, despite bulk deliveries of fuel occurring in 2021 and 2022 (after Agnico Eagle acquired the Hope Bay Project). The lack of updates is non-compliant with Agnico Eagle's OPPP/OPEP document review and annual risk assessment review procedures and may have put both workers and the environment at greater risk.</p>
Detailed Review Comment	<p>Oil Pollution Emergency Plan (OPPP/OPEP) that suggest the plans have not been meaningfully updated since 2020 (by TMAC):</p> <ul style="list-style-type: none"> Section 1.3 (Document Review Procedures) – <i>“This plan is effective August 1, 2020 and will remain in effect until completion of the 2020 transfer. A new plan will be written and submitted for approval for any future year’s fuel transfer activities.”</i>



	<ul style="list-style-type: none"> • Section 3.4.5 (Roberts Bay Oil Handling Facility General Information) – <i>“Note 3: At the design stage, the fuel distributor is not known. Therefore, the values available from the Meliadine distributor was used (pumps, hoses, ship, etc.).”</i> • Section 3.7.1 (Oil Pollution Response Exercise Program) – <i>“The last such Incident Management exercise was conducted in April, 2018.”</i> However, Schedule 7a (OHF Oil Pollution Response Program – Exercise Plan) states that the last tabletop management exercise was completed January 22, 2020. The required frequency is once every three (3) years. • Schedule 5 (Hope Bay Spill Response Equipment Inventory) – <i>“Essentially the same as the 2019 Inventory. Being provided separately as the 2020 Inventory will not be completed until after the draft OPPP/OPEP is submitted for approval. A full sized 2020</i> • <i>Inventory will be in the Command Post at the time of the Fuel</i> • <i>Transfer.”</i> (Note: the spill equipment inventory table also appears to be improperly copied into Schedule 5, as the information presented is nonsensical, out of alignment, and includes many empty rows.) • Schedule 7b (OHF Oil Pollution Response Program – Training Matrix) – The matrix ends with OPPP/OPEP Training in 2019. None of the Hope Bay personnel listed in Table 5 (Hope Bay Site Emergency Contacts List) are included in this training matrix. The only personnel listed in Table 6 (External Key Contacts List) who have completed training (according to Schedule 7b) are Scott Hopkins from Fathom and David Ridge from Crowley. After the training matrix, there is a table that shows “2020 Transfer Details”. • Section 2.3 (Annual Risk Assessment Review for Bulk Fuel Transfers) – <i>“Prior to bulk fuel transfers, Agnico Eagle conducts a cross-functional risk assessment review session to identify the risks associated with the fuel transfer operation (such as environmental and worker hazards) and devises means of mitigating risks. ... An updated copy of the Annual Risk Assessment Review is provided in Schedule 9.”</i> However, Schedule 9 includes the 2020 Fuel Transfer Risk Assessment for TMAC Resources Inc. dated May 1, 2020. <p>The KIA understands that no bulk diesel fuel delivery occurred in 2023 (Section 3.1 of the 2023 NIRB Annual Report). However, sealift operations in 2021 and 2022 included delivery of diesel fuel to support Project activities (2021 and 2022 NIRB Annual Reports). As such, Agnico Eagle should have produced a meaningfully updated OPPP/OPEP, including plan components such as the annual risk assessment review, in 2021 and 2022.</p>
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	<p>Agnico Eagle's comments to PC No. 003, Revised TCs No. 20 and 33, and PC No. 009, New TC No. 52, note that the OPPP/OPEP was recently updated in March and has been sent to Transport Canada for approval. The Document Control section (p. iii) of the OPPP/OPEP states that the March 2024 changes consisted of updates <i>"to support Agnico Eagle formatting and nomenclature and for the addition of a Document Control table. Further changes made to update emergency contacts and procedures as well as updated flow rates."</i> The Agnico Eagle Permitting Team responsible for the March 2024 updates should be familiar with their requirements for annual reviews and revisions. If they are not, this should be pulled out of all plans and included in their internal training.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please explain why the OPPP/OPEP has not been meaningfully updated since 2020, despite bulk fuel transfers occurring in 2021 and 2022. The lack of updates is non-compliant with Agnico Eagle's OPPP/OPEP document review and annual risk assessment review procedures and may have put both workers and the environment at greater risk.
Importance	High

KIA-NIRB-26

Review Comment Number	KIA-NIRB-26
Subject/Topic	Marine mammal monitoring program
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Section 3.12.2.1 • Appendix U: Marine Mammal Monitoring in Roberts Bay, 2023 • Appendix AB: Marine Mammal Monitoring SOP <p>Agnico Eagle, Hope Bay Project, Shipping Management Plan (March 2024)</p> <ul style="list-style-type: none"> • Section 4.1 • Appendix A: Materials Provided to Vessel Operators <p>Agnico Eagle, Hope Bay Project, Proponent's Response to Comments Received on the NIRB 2022 Annual Report (September 2023)</p>



	<ul style="list-style-type: none"> KIA-NIRB-03 <p>Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)</p> <ul style="list-style-type: none"> Project Certificate No. 009, New Term and Condition No. 33
Summary	<p>The KIA appreciates that a marine mammal monitoring program in Roberts Bay was implemented in 2023, but requests clarification on the methods based on the results presented in the 2023 WMMP Compliance Report. These questions concern survey timing, locations, data recording and summarization, marine mammal ID guide, and the planned duration of the program.</p>
Detailed Review Comment	<p>The KIA is pleased to see that a marine mammal monitoring program was implemented in 2023 to assess disturbance of marine wildlife during shipping season from vessel noise. The KIA has some questions about the methods as they were not clear in Section 3.12.2.1 of the 2023 WMMP Compliance Report, the updated Shipping Management Plan, or the Marine Mammal Monitoring SOP.</p> <p>This program would benefit from an update to the SOP to reduce ambiguity. Points of ambiguity are noted in the following paragraphs for consideration of how the wording in the SOP, and within results reporting, could be modified to eliminate these questions. The timing of marine mammal monitoring surveys is ambiguous. Section 4.1 of the Shipping Management Plan states that during the Before Shipping period, Environment staff will be deployed to conduct <i>“one 30-minute survey of the Bay throughout the day”</i> for four days prior to the vessel arriving. For the During Shipping period, <i>“surveys will be conducted using the same methods and at the same times of day (where possible) as during the “Before” period”</i> for at least four days when the vessel is anchored, and barge trips are occurring. During the After Shipping period, staff will again <i>“conduct one 30-minute survey of the Bay throughout the day”</i> for four days after the vessel departs, following the same methods as for Before and During periods.</p> <p>Section 2.3 of the Marine Mammal Monitoring SOP has similar instructions as the Shipping Management Plan, with respect to one 30-minute survey daily, but does not include the ambiguous <i>“throughout the day”</i> wording. Please confirm if the intention is to survey Roberts Bay for marine mammals at various times of day for a total duration of 30 minutes (e.g., 3 surveys x 10 min each or 6 surveys x 5 min each throughout the day) or to complete a continuous 30-minute survey once a day. If it is the latter approach, how was the survey timing decided? Were the surveys timed for when marine mammals may be more likely to be present/active in Roberts Bay, when the vessel was planned to arrive and leave, and when barge trips were planned?</p>



Appendix U of the 2023 WMMP Compliance Report does not provide answers to these timing questions. This summary of marine mammal monitoring results only provides timing details for when wildlife was observed, but not when there were 'No observations'. Yet there are sometimes more than one 'No observations' rows per date (August 29, 30, 31; September 2, 3) and sometimes only a single row (September 4, 6-16). Do the number of rows reflect the number of surveys completed?

Furthermore, the marine mammal observations ranged in time from 7:20 (During Shipping) to 21:20 (Before Shipping). Thus, it appears that the surveys were not completed at the same times of day, unless the surveys were, indeed, conducted throughout the day (but the information is not presented in Appendix U).

Section 2.4 and Figure 1 of the Marine Mammal Monitoring SOP indicate that two monitoring locations have been selected for the best visibility: the jetty and the 730 building. Agnico Eagle states that a minimum of one observer will actively survey for 30 minutes per survey. It is unclear if this means a minimum of one observer at each location (completing simultaneous surveys), or a minimum of one observer who will start at one location and then move to the second location. Furthermore, is the procedure to survey at each location for 30 minutes or would both locations be surveyed for 30 minutes total (e.g., 15 minutes each)? Or would the observer(s) select only one location to survey per day? Appendix U includes two sets of UTM coordinates for the surveys completed on August 29 and 31, suggesting that surveys are conducted at both approved locations, but these location details were not entered/summarized for the other entries.

In Sections 2.4.1 and 2.4.2 of the Marine Mammal Monitoring SOP, observers are instructed to record, among other things, vessel activity (e.g., location, direction of travel), a description of what was seen (for unknown species), and notes about pinnipeds hauled-out on land. The summary of monitoring results in Appendix U only has one entry in the Comments field: an unknown seal was *"Resting on a rock in open water, didn't react to tugboats going by."* There are no descriptions (e.g., colour, size) for the three unknown seal entries, no indication whether the "resting" and "basking" seals were observed on land, and no other comments about vessel activity. For the latter, it is unclear if the majority of surveys did not coincide with vessel/barge/tugboat activity, or if observers were not following the SOP for data recording.



	<p>In Section 2.4.2 and on the Roberts Bay Marine Mammal Survey Data Sheet, observers are instructed to record the angle of the wildlife sighting relative to the observer location. However, it is not a requirement for the observer to mark their heading or to face a specific direction for the survey. As such, how can the angle of sighting be used to determine where the animal was observed? There are also differences between the data sheet and the Marine Mammal Observation Data Key that should be corrected to avoid confusion and inconsistent data entry. For example, the data field for Visibility is in km but the key provides instructions in miles; and the data field for Wind Direction is in N/E/S/W but the key mentions degrees relative to the observer's heading. Furthermore, the Comments line at the bottom of the key mentions using a 'Sighting Number' as an identifier to cross- reference multiple sheets; however, there is no space to enter a unique sighting number on the data sheet.</p> <p>During the 2022 NIRB Annual Report review, the KIA noted that ringed seal was not included in Agnico Eagle's marine wildlife ID guide despite being a species of conservation concern, a species that is semi-frequently observed at and around the Hope Bay project site, and the representative species for marine mammal VECs (KIA-NIRB-03). The Common Pinniped ID Guide attached to the Marine Mammal Monitoring SOP has not been updated to include ringed seal. Please add ringed seal to the next iteration of the SOP and species ID guide.</p> <p>Finally, Agnico Eagle's comments to PC No. 009, New TC No. 33, and Section 4 of the Shipping Management Plan indicate <i>that "the first two years of monitoring will inform appropriate indicators and thresholds to determine if negative impacts on marine wildlife are occurring."</i> If shipping activities during Care and Maintenance (and Agnico Eagle forecasts that the Project will remain in Care and Maintenance in 2024; see Section 4 in the 2023 NIRB Annual Report) are expected to be different than Construction and Operations, then it may not be appropriate to use 2023-2024 monitoring data (only) to make impact assessment and management decisions. The KIA recommends that Agnico Eagle and Fisheries and Oceans Canada (who will help determine appropriate indicators and thresholds, as per New TC No. 33) view the marine mammal monitoring program in 2023 as a pilot study, especially if methodological improvements may need to be made for future years. The language in the Shipping Management Plan should also be amended to consider Project phase instead of simply <i>"the first two years of monitoring"</i>.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please clarify how the 30-minute marine mammal monitoring survey is conducted and update the SOP and reporting to



	<p>reflect the clarifications needed: is one continuous survey or multiple surveys (e.g., 5 or 10 min each) done throughout the day? Are surveys done at both approved locations, simultaneously or in sequence, or only one location per day?</p> <ul style="list-style-type: none"> • Please add ringed seal to the marine mammal ID guide. Although it is not a common pinniped, it is a species of conservation concern and the representative species for marine mammal VECs for the Hope Bay Project. • Please clarify how the timing of marine mammal monitoring is decided. Did surveys in 2023 capture the times when the vessel was actively arriving and departing, and when barge trips were actively occurring between the vessel and the jetty? Were surveys conducted at approximately the same times of day for the Before, During, and After shipping periods? • Please amend how marine mammal monitoring results are summarized for annual reporting, including the timing and location of surveys even when no animals were observed. The observation of no marine mammals, when observations are occurring, still provides meaningful information over time. • Please ensure that observers follow the Marine Mammal Monitoring SOP with respect to data recording. The summary of results in Appendix U did not include details and descriptions specified in the procedures. • Please revise the Marine Mammal Survey Data Sheet and/or Data Key for consistency to avoid confusion (see Detailed Review Comment). • Please amend the timeline for marine mammal monitoring from “the first two years of monitoring” to include consideration of Project phase (i.e., Care and Maintenance vs. Construction and Operations) before determining appropriate indicators and thresholds.
Importance	High

KIA-NIRB-27

Review Comment Number	KIA-NIRB-27
Subject/Topic	Noise monitoring during blasting
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Sections 2.5 • Appendix C: Hope Bay Quarry Blast Noise Monitoring SOP



	<p>Agnico Eagle, Hope Bay Project, 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023)</p> <ul style="list-style-type: none"> Appendix 2.5-1: Hope Bay Quarry Blast Noise Monitoring SOP <p>Agnico Eagle, Hope Bay Project, Proponent's Response to Comments Received on the NIRB 2022 Annual Report (September 2023)</p> <ul style="list-style-type: none"> KIA-NIRB-07
Summary	<p>The updated Quarry Blast Noise Monitoring SOP no longer includes important instructions to minimize extraneous noise nor describes follow-up noise monitoring procedures based on the results. These SOP changes may explain why noise monitoring during blasting in 2023 occurred at suboptimal locations and conditions, which resulted in data that are difficult to interpret.</p>
Detailed Review Comment	<p>Agnico Eagle completed noise monitoring during three occurrences of quarry blasting in October 2023 (Section 2.5 of the 2023 WMMP Compliance Report). All three Lpeak recordings exceeded the predicted 96 dB (the noise level with potential to produce a freeze or startle response in caribou). Agnico Eagle states that <i>"the Lpeak recordings could have been from other noise sources noted at the time of the blasts (talking, footsteps, vehicle movement, doors closing, noise from the workshop, backup alarms, ravens and wind gusting. The location of the monitor on October 5th also had camp buildings between it and the blast location."</i></p> <p>The KIA has concerns about the noise monitoring methods employed in 2023 and the utility of the resulting data. Agnico Eagle's updated Hope Bay Quarry Blast Noise Monitoring SOP (Appendix C of the 2023 WMMP Compliance Report) has been severely trimmed down from the previous version attached to the 2022 WMMP Compliance Report (Appendix 2.5-1). Of note, the 2022 SOP had included the following steps to minimize the types of extraneous noise detected during 2023 noise monitoring:</p> <p>Sections 1.3.1 (Preparation for the Field): <i>"Avoid taking measurements in winds > 6 m/s (12 mph) or rain (other than light showers). Excessive wind can introduce low frequency noise due to air movement over the windscreen and can result in non-typical noise due to wind in trees. Heavy rain can increase background noise levels. Even light rain can increase tire noise when monitoring near roadways. ... Avoid locations that could be affected by nearby construction noise or added noise from nearby personnel, creeks, or anything that could be moved by wind. Sound reflections off buildings or other solid objects can significantly</i></p>



	<p><i>affect measured levels. Try to have microphone at least 3 m away from large reflecting surfaces."</i></p> <p>Section 1.3.2 (Deployment Setup): <i>"Step 6. Once the meter has been started, try to minimize any noise... It is recommended to leave the area while monitoring is occurring. Attempt to be as quiet as possible while leaving or, if this is not practical, make a note of the time at which you departed from the site. If personnel stay in the area, all engines must be shut off and silence is required."</i></p> <p>By contrast, the 2023 SOP does not mention anything about minimizing noise. If such instructions were not provided to Project staff undertaking noise monitoring, then it is not surprising that the blast results would be compromised and that these caveats would be presented in the interpretation of results.</p> <p>In addition, Section 2 of the 2022 SOP provides follow-up procedures based on the noise monitoring results: <i>"Upon receiving the data, ERM will analyze the results of the noise monitoring and present a noise profile. This will determine where to subsequently monitor: If the dB Lpeak is below 96 dB at 2 km, then monitoring will move to 1.5 or 1 km from the blast next. If the dB Lpeak is above 96 dB at 2 km, then monitoring will move to 3 km from the blast next."</i> The 2023 SOP does not include these procedures, and only indicates that the prescribed monitoring location is <i>"~2km from blast location"</i> (Section 8.02).</p> <p>It is unclear if both SOPs are meant to be used for the Hope Bay Project. During the 2022 NIRB Annual Report review, the KIA had commented on the different noise monitoring equipment proposed by Agnico Eagle (SoundAdvisor 831C) versus the B&K 2250 model specified in the 2022 SOP (KIA-NIRB-07). Thus, is the 2023 SOP intended to be a supplemental procedure for the updated equipment, rather than fully replacing the previous SOP? The KIA had also requested updates to the noise monitoring field data sheet (KIA-NIRB-07). However, Agnico Eagle did not address this recommendation/request in their response and there is no data sheet attached to the 2023 SOP, so it is unclear if the requested changes were made.</p> <p>Due to the Lpeak exceedances and confounding factors that occurred during noise monitoring in 2023, Agnico Eagle should continue to monitor noise (using more appropriate methods and site selection) during blasting in 2024. Agnico Eagle acknowledges that more work is needed for noise monitoring during blasting at the end of Section 2.5. However, their wording of <i>"to obtain results sufficient for testing</i></p>
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	<i>the sound level at the exact time of the blasts</i> ” is ambiguous. Please confirm if this is referring to the suboptimal conditions during recording (as described above), or if there was also a timing and/or data recording issue with respect to the blasts.
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please explain why important instructions, such as measures to minimize extraneous noise and follow-up procedures based on the results, have been removed from the 2023 version of the Hope <p>Bay Quarry Blast Noise Monitoring SOP.</p> <ul style="list-style-type: none"> Please clarify if the 2022 and 2023 Quarry Blast Noise Monitoring SOPs are meant to be used together. If so, please rename the 2023 version to be a work procedure/instruction for the SoundAdvisor 831C. Please confirm if the noise monitoring field data sheet has been updated with the KIA’s requested changes from the 2022 NIRB Annual Report review (KIA-NIRB-07). Please ensure that noise monitoring during blasting is continued in 2024 and uses appropriate methods to accurately capture blasting noise while minimizing other noises. Please clarify what Agnico Eagle meant with respect to needing additional work “<i>to obtain results sufficient for resting the sound level at the exact time of the blasts</i>” in Section 2.5 of the 2023 WMMP Compliance Report.
Importance	High

KIA-NIRB-28

Review Comment Number	KIA-NIRB-28
Subject/Topic	Traffic monitoring data missing or not reported
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> Sections 2.2.2, 2.2.3; Table 6 <p>Agnico Eagle, Hope Bay Project, 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023)</p> <ul style="list-style-type: none"> Sections 2.2.2, 2.2.3; Table 2.2-3



	<p>Agnico Eagle, Hope Bay, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> Section 3.1.5.1
Summary	<p>It appears that camera traffic monitoring data between October and December have not been included in the past two cycles of annual reporting, at minimum. Agnico Eagle should clarify the months/periods when cameras monitoring traffic malfunctioned, and whether corrective actions have been taken to prevent camera failures in the future.</p>
Detailed Review Comment	<p>In the Methods (Section 2.2.2) for Traffic Monitoring, Agnico Eagle states that data are not available after September due to the timing of camera checks. However, unlike the Project's Wildlife Camera Monitoring, where the results are reported from September 2022 to September 2023, Agnico Eagle only presents traffic data from January 2023 to September 2023, broken down into 3-month intervals (Table 6). The KIA notes that the previous 2022 WMMP Compliance Report also presented traffic monitoring results from January 2022 to September 2022. Therefore, vehicle traffic rates between October and December have not been reported for at least two years. The WMMP Plan does not indicate that traffic monitoring is only seasonal; Section 3.1.5.1 (Road Traffic) states that vehicle traffic <i>"data will be used to determine monthly traffic volumes throughout the year."</i></p> <p>In addition to the missing months, there is a note underneath Table 6 stating that vehicle traffic data are unavailable for Roberts Bay to Doris in February to April and September, and for Doris to Madrid North in July. If Doris to Madrid is missing only July data, why does Table 6 show 'No Data' for the period of April to June 2023? Furthermore, the text in Section 2.2.3 indicates that camera data were not available along the Doris to Madrid route (Camera 35) in September 2023 due to a camera card malfunction. Please confirm if Camera 35 malfunctioned in all of April, May, June, July, and September 2023, the reason(s) for all malfunctions, and if corrective actions have been taken to prevent camera failures in the future.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please investigate how long vehicle traffic between October and December has been excluded from annual reporting. Please present the complete results, compared to FEIS predictions, in Agnico Eagle's responses to the 2023 NIRB Annual Report review comments. Please ensure that vehicle traffic for the entire reporting period (e.g., September to September) is included for future annual reporting. Please clarify when the Doris to Madrid North route (Camera 35) malfunctioned in 2023, as Sections 2.2.2 and 2.2.3 seem to



	<p>indicate that it collected no data in five out of the nine months analyzed.</p> <ul style="list-style-type: none"> Please provide more information on the cause(s) of Camera 35 malfunction and if corrective actions have been taken to prevent camera failures in the future.
Importance	High

KIA-NIRB-29

Review Comment Number	KIA-NIRB-29
Subject/Topic	Wildlife camera effort in 2023
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> Sections 3.2.1, 3.3.1, 2.2.3, 3.4.3.2, 3.6.3.1 Tables 12, 13, 15 <p>Agnico Eagle, Hope Bay Project, Proponent's Response to Comments Received on the NIRB 2022 Annual Report (September 2023)</p> <ul style="list-style-type: none"> KIA-NIRB-08
Summary	<p>Agnico Eagle's reporting of camera effort in 2023 is confusing and incomplete. Not all 60 cameras at Doris are accounted for in the Results reporting. September 2023 camera effort was mysteriously low. Agnico Eagle did not include a discussion of ongoing mitigation attempts to prevent/reduce snow occlusion (side-shields).</p>
Detailed Review Comment	<p>Agnico Eagle's reporting of camera effort in 2023 is confusing and incomplete. A total of 60 cameras were set up in the Doris and Madrid areas (Section 3.2.1); however, according to Table 12, 57 cameras (21+17+19) were active between September and November 2022, and 56 cameras active between December 2022 and September 2023 (21+17+18). What happened to the missing 3-4 cameras? The KIA notes that the Camera Monitoring Statistical Analysis sections for caribou and grizzly bear (Sections 3.4.3.2 and 3.6.3.1, respectively) mention 58 cameras total, which is also different from the numbers in Table 12.</p> <p>There is a footnote under Table 12 explaining that the number of 'Unobscured' cameras refers to those <i>that "were not knocked over or obscured by snow for the entire month."</i> September 2023 had the lowest number of unobscured cameras: 2 in the Treatment zone, 5 in the ZOI, and 4 in the Control zone for a total of 11 out of 56 active</p>



	<p>cameras (19.6%). Agnico Eagle states in Section 3.3.1 that seven Doris cameras were found knocked down during camera checks in September 2023; and Table 13 shows that two camera tripods were found broken and repaired in September 2023. These numbers only account for nine ‘obscured’ cameras – what happened to the other 36 non-functional cameras? Snow occlusion should not have been an issue at this time. In Section 2.2.3 (Traffic Monitoring – Results), Agnico Eagle had stated that camera data were unavailable for certain months for Cameras 18 and 35 due to snow occlusion and/or camera card malfunctions. Camera card malfunctions are not mentioned in Section 3.3.1 for the wildlife camera monitoring program. Please confirm if SD card malfunctions occurred for other cameras in 2023 and if corrective actions have been taken to prevent recurrence.</p> <p>Furthermore, Table 15 (Caribou Events) indicates that in September 2023, camera effort consisted of only 19 camera days and had only one unobscured camera, located in the Control zone. Please clarify/reconcile how the 11 unobscured cameras remaining for September 2023 in Table 12 became a single unobscured camera in Table 15.</p> <p>Finally, the KIA previously commented on snow occlusion and potential design mitigation during the 2022 NIRB Annual Report review. In response to KIA-NIRB-08, Agnico Eagle stated that, <i>“Anecdotally, cameras with side- shields have been noted to have more snow/ice buildup due to the shields providing a structure for the snow to accumulate on and reducing wind clearing the snow off. The 2023 WMMP Report will include an assessment of whether there is any difference in camera effort days overwinter for cameras with and without side-shields. If the overwinter effort days are higher for these cameras with side-shields, the remaining cameras will have the shields added in 2024.”</i> Agnico Eagle did not include this assessment in the 2023 WMMP Compliance Report.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please explain what happened to the ‘missing’ Doris-Madrid cameras: 60 were deployed but Table 12 and Sections 3.4.3.2 and 3.6.3.1 indicate there were only 56-58 active cameras in 2023. • Please explain why the September 2023 camera effort was so low. The number of knocked-down cameras and broken tripods does not account for all 45 ‘obscured’ cameras. • Please explain the differences in camera effort between Table 12 and Table 15, especially the ‘loss’ of nine cameras in September 2023 for subsequent data analyses.



	<ul style="list-style-type: none"> Please provide a discussion of cameras with and without side-shields, which Agnico Eagle stated would be included in the 2023 WMMP Report in their response to KIA-NIRB-08 during the 2023 NIRB Annual Report review.
Importance	High

KIA-NIRB-30

Review Comment Number	KIA-NIRB-30
Subject/Topic	Proposed discontinuance of camera ZOI analyses
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> Sections 3.4.3.2, 3.6.3.1, 3.7.3.1 (Statistical Analysis) Sections 3.4.4.2, 3.6.4, 3.7.4 (Discussion) Tables 16, 23, 27, 28 Figure 20 <p>Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)</p> <ul style="list-style-type: none"> Project Certificate No. 003, Revised Term and Condition No. 22 Project Certificate No. 009, New Term and Condition No. 19
Summary	Agnico Eagle is proposing to stop conducting camera ZOI analyses for caribou, grizzly bear, and wolverine after 2023. The KIA has comments regarding triggers for resuming ZOI analyses, the statistical analyses used for camera data, and the rationale provided to support this proposal.
Detailed Review Comment	Agnico Eagle is proposing that 2023 be the last year of conducting camera ZOI analyses for caribou (Sections 3.4.3.2, 3.4.4.2), grizzly bear (Sections 3.6.3.1, 3.6.4), and wolverine (Sections 3.7.3.1, 3.7.4). This proposed change to the WMMP Plan will be discussed at the first IEAC meeting in 2024. Agnico Eagle plans to continue with the camera monitoring program and reporting wildlife VEC detections in annual WMMP Compliance Reports and may resume ZOI analyses if patterns in wildlife VEC occurrence change (as evidenced by increased or decreased detections by camera zone or season). Since the Project is currently in Care and Maintenance, the KIA requests that camera ZOI analyses be resumed upon a change in Project phase/activities, regardless of camera detection patterns. There may be different ZOI-type effects depending on Project activities, and using the Project phase transition as another trigger would enable more timely analyses and, thus, more timely adaptive management, if



	<p>needed. In addition, the KIA is not fully convinced of Agnico Eagle's rationale to discontinue the ZOI analyses, as summarized below.</p> <p>Agnico Eagle's modelling of the number of caribou events captured by cameras indicated that the predicted caribou abundance was not significantly different between Treatment vs. Control cameras ($p=0.95$), nor between Treatment vs. ZOI cameras ($p=0.87$; Table 16). (Note: There is a material typo that needs to be fixed – the p-values reported in text are opposite of what is presented in Table 16.) Similarly, the number of predicted grizzly bear events was not significantly different between Treatment vs. Control cameras ($p=0.83$), nor between Treatment vs. ZOI cameras ($p=0.11$; Table 23). (Note: Agnico Eagle states at the top of p. 71 that “<i>differences between ZOI and Control were also nonsignificant</i>”; however, Table 23 does not present a comparison of ZOI vs. Control.) Since the past six years of camera data suggest that caribou are not avoiding the project, and grizzly bear are not attracted to or avoiding the Project, Agnico Eagle considers the FEIS predicted effects to be confirmed.</p> <p>For wolverine, Agnico Eagle continued to model occupancy (instead of number of events) in 2023 due to the low number of camera detections. Table 27 shows a significant difference in predicted wolverine occupancy between the Treatment and Control zones ($p<0.01$) and between the Treatment and ZOI zones ($p<0.01$). Agnico Eagle then conducted a secondary regression analysis (Table 28) and found a significant effect of distance to infrastructure ($p<0.001$), which suggests that wolverines may be avoiding Project infrastructure. The regression in Figure 20 shows that the probability of wolverine occupancy increases from approximately 0.03 to 0.10 between 0 km and 17.5-20 km from infrastructure. Therefore, it is possible that the predicted ZOI (2-10 km from the Project) does not sufficiently capture potential Project effects on wolverine. It is unclear how Agnico Eagle interpreted these results to mean that “<i>Modelling of all of camera monitoring data since June 2016 has shown that wolverines are not avoiding the Project</i>” (Section 3.7.3.1, p. 81) or that “<i>The significant difference between the Treatment and ZOI camera zones in the main analysis indicates a potential ZOI is occurring within 2 km of infrastructure</i>” (Section 3.7.4). Furthermore, despite these results indicating a potential – but still inconclusive – ZOI for wolverine, Agnico Eagle also proposes to discontinue the camera ZOI analysis program for this wildlife VEC.</p> <p>Agnico Eagle's rationale appears to be that since the FEIS predictions included only a low magnitude residual effect of attraction, potential avoidance effects that were not predicted but are now occurring are not of concern. The monitoring phase following an Impact</p>
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	<p>Assessment (IA) is meant to serve several purposes, including testing IA prediction accuracy. An effect moving in a direction opposite to what was predicted would fall into that category. Even as Agnico Eagle argues on p. 84 that <i>“Wolverine have very large home ranges compared to the Project area, and potential avoidance is unlikely to impact a significant portion of any individual’s territory”</i>, it is important not to ignore potential negative effects on wolverine as these predictions help to inform future mining impacts to wildlife, and ignoring them is contrary to the spirit of PC No. 003, Revised TC No. 22 (Objective: To collect baseline information on wolverine and grizzly bear populations in the area in order to assess impacts of the Project) and PC No. 009, New TC No. 19 (Objective: To ensure a holistic and comprehensive approach to mitigate, monitor, and adaptively manage potential impacts to wildlife). These TCs are meant to address potential Project impacts and the Project’s cumulative effects on wildlife and wildlife habitat.</p> <p>Additional details on the statistical modelling may improve the reviewer’s confidence in Agnico Eagle’s results and interpretations, not only for wolverine but also caribou and grizzly bear. For example, Agnico Eagle states that the best fit model for grizzly bear included smooth functions for month and northing as well as random variables for camera number and year (p. 70); while the best fit model for wolverine did not include the smooth functions for easting, northing, or month (p. 80). Please provide the fit statistics and model rankings for all statistical analyses of camera data for the KIA and other interested parties for review. This information would assist in determining if Agnico Eagle’s suggestion to stop camera ZOI analyses is valid for any or all wildlife VECs.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <p>If the camera ZOI analyses are discontinued in 2024, please include change in Project phase (e.g., coming out of Care and Maintenance) as a trigger to resume these analyses, in addition to changes in camera detection or occupancy patterns.</p> <ul style="list-style-type: none"> • Please provide the model fit statistics and rankings for camera ZOI • analyses for caribou, grizzly bear, and wolverine. • Please consider continuing the camera ZOI analyses for wolverine, at minimum, since a conclusive ZOI has not yet been found and potential avoidance effects should be included as part of a cumulative effects assessment. • Please share the results of the IEAC meeting where the topic of discontinuing the camera ZOI analyses was discussed.



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	<ul style="list-style-type: none"> Please clarify if Agnico Eagle will be considering the input of other intervenors for this proposed WMMP Plan change.
Importance	High

KIA-NIRB-31

Review Comment Number	KIA-NIRB-31
Subject/Topic	Air quality guidelines for dust deposition
References	<p>Nunami Stantec Limited, Q1-Q3 2023 Atmospheric Compliance Monitoring Program Report – Doris and Madrid Projects (March 2024)</p> <ul style="list-style-type: none"> Section 2.2.1, Table 2-1 Section 3.2.3 <p>TMAC Resources, Hope Bay, Air Quality Management Plan (April 2019)</p> <ul style="list-style-type: none"> Table 1
Summary	<p>Alberta Ambient Air Quality Objectives and Guidelines for dustfall (158 mg/100-cm²/30-days) are from 1975. The Government of Northwest Territories recently published their Ambient Air Quality Monitoring Guideline, which adopted a more conservative dustfall criterion of 87 mg/100-cm²/30-days developed by the Government of British Columbia (2016, 2020), which is likely more relevant to Nunavut. The Hope Bay Air Quality Management Plan, which includes the ambient air quality guidelines used by Agnico Eagle, has not been updated since 2019.</p>
Detailed Review Comment	<p>Table 2-1 in the Q1-Q3 2023 Atmospheric Compliance Monitoring Program Report – Doris and Madrid Project (hereafter ‘2023 AQMP Compliance Report’) presents ambient air quality standards, objectives and guidelines compared to the 2017 FEIS predictions. Agnico Eagle has adopted Nunavut Ambient Air Quality Guidelines (2011) and drawn from other jurisdictions when Nunavut guidelines were not available.</p> <p>For dust deposition, Agnico Eagle is using the Alberta Ambient Air Quality Objectives and Guidelines: 158 mg/100-cm²/30-days for commercial and industrial areas. It is unclear why Agnico Eagle selected these Alberta guidelines, which were put into effect in 1975 and have not been reviewed, and also not the most conservative values available from other government agencies in 2020 (the citation date provided by Agnico Eagle). Recently, in April 2023, the Government of Northwest Territories (GNWT) published their Ambient Air Quality Monitoring Guideline in Support of the Environmental Agreements and Memorandums of Understanding with</p>



	<p>Mine Operators. Table 2.5 shows a dustfall criterion of 2.9 mg/dm²/day (=87 mg/100-cm²/30-days) for Industrial/Other receptor types. The GNWT adopted these dustfall guidelines from the British Columbia Ministry of Environment and Climate Change Strategy, originally a memorandum from 2016 but also updated as Technical Guidance in June 2020.</p> <p>The Hope Bay Air Quality Management Plan has not been updated since 2019 (still a TMAC document). Agnico Eagle should review and revise this management plan, including updating the relevant regulations, standards, guidelines, and objectives in Table 1 and applying these guidelines for future atmospheric compliance monitoring analyses.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please consider adopting the 2023 GNWT Ambient Air Quality Monitoring Guideline for contaminants where Nunavut does not currently have standards, such as dustfall. • Please review and revise the Hope Bay Air Quality Management Plan, which has not been updated since 2019. Ambient air quality guidelines from various government agencies have since been updated and should be reflected in the revised AQMP.
Importance	High

KIA-NIRB-32

Review Comment Number	KIA-NIRB-32
Subject/Topic	Camera monitoring reporting periods
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Sections 3.4.3.2, 3.5.3.1, 3.6.3.1, 3.7.3.1, 3.8.3.1 • Tables 15, 26 • Figures 13, 15, 17, 19, 22 • Appendix D: Wildlife Camera Locations and Camera Effort by Month, Doris and Madrid Areas, June 2016 to September 2023 • Appendix E: Camera Summary of Wildlife Images and Events, Doris and Madrid Areas, September 2021 to September 2023 • Appendix F: Wildlife Events Recorded by Wildlife Cameras, Doris and Madrid Areas, September 2021 to September 2023



	<ul style="list-style-type: none"> Appendix L: Wildlife Events Recorded by Wildlife Cameras, Boston Project, September 2021 to September 2023
Summary	<p>Camera monitoring results are presented in a confusing and inconsistent way throughout the 2023 WMMP Compliance Report. Agnico Eagle presents different wildlife camera monitoring periods between the text, tables, figures, and appendices, and it is difficult for the reviewer to determine if these are clerical errors (due to inadequate quality control) or incorrect data.</p>
Detailed Review Comment	<p>Camera monitoring results are presented in a confusing and inconsistent way throughout the 2023 WMMP Compliance Report. For example, the text in Section 3.4.3.2 (Caribou) describes <i>“all years of the camera monitoring program from June 2016 to September 2023”</i> and references Table 15, Figure 13, and Appendix D. However, the caption for Table 15 mentions data from January 2020 to September 2023, while the table itself includes data from September 2022 to September 2023. Given that this is the 2023 annual reporting period, a period of September 2022 to September 2023 would be most sensible. Figure 13 is captioned as June 2016 to September 2023, which appears to be correct (or at least more than September 2022 to September 2023, as the numbers would not match Table 15).</p> <p>Appendix D is also entitled June 2016 to September 2023 and explicitly includes all data. However, it is unclear why there is a column for ‘Summary Camera Effort January 2019 – May 2022’, such that the reporting period appears to be June 2022 through September 2023. Indeed, a check of the first row (Camera 1) under the erroneous ‘Summary Camera Effort September 2021 – September 2022’ heading shows that the Total camera effort of 285 camera days is a sum of the June 2022 to September 2023 values, rather than September 2022 to September 2023 (which would be 193 camera days). Is there a reason why Appendix D presents a different reporting period than the main body of the 2023 WMMP Compliance Report?</p> <p>The KIA notes that Appendix E is never referenced in the 2023 WMMP Compliance Report but it presents another, different reporting period of September 2021 to September 2023. This title/caption does not appear to be a typo, as there are wildlife detections/events that were not described in the current reporting period. For example, Section 3.4.3.2 stated that <i>“During the monitoring period from September 2022 to September 2023, only one site specific monitoring camera recorded caribou. Twenty-one events occurred at camera 51 on the south end of the TIA in 2023.”</i> However, Appendix E shows 49 caribou events at Camera 51 and caribou activity at the other site-specific monitoring Cameras 2, 35, and 52. As</p>



	<p>another example, Section 3.7.3.1 states that “No wolverine events were recorded on facility cameras between September 2022 and September 2023”. However, Appendix E shows that Camera 22 detected two wolverine events.</p> <p>Similar reporting and clerical issues occur for other wildlife VECs of relevance to the camera monitoring program. For example, in Section 3.5.3.1 (Muskox – Camera Monitoring Results), Agnico Eagle discusses the monitoring period of September 2022 to September and references Table 20, Figure 15, Appendix F, and Appendix O. On Figure 15 – as well as Figures 17, 19, and 22 for grizzly bear, wolverine, and nest predators, respectively – the caption again notes June 2016 to September 2023, but there is an asterisked note at the bottom of the map indicating that the detection events are from September 2019 to September 2020 and only for certain Treatment zone cameras.</p> <p>The cover page for Appendix F is entitled September 2021 to September 2023; however, the caption notes September 2021 to August 2023 and, indeed, there do not appear to be any data from September 2023 in the table. Finally, Appendix L (Boston Project) is entitled September 2021 to September 2023, but the table includes wildlife events as early September 2019.</p> <p>In summary, Agnico Eagle presents different wildlife camera monitoring periods between the text, tables, figures, and appendices, and it is difficult for the reviewer to determine if these are clerical errors (due to inadequate quality control) or incorrect data. These inconsistencies cause mistrust of the quality control of the data analysis and reporting. Please ensure that all components of the WMMP Compliance Report and other annual reporting documents are thoroughly updated and reflect the appropriate reporting period(s).</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please clarify which camera reporting period(s) are meant to be presented in the main body of the 2023 WMMP Compliance Report and associated tables, figures, and appendices. Refer to the Detailed Review Comment for specific examples of discrepancies. • Please endeavour to present consistent information and appropriate reporting period(s) throughout the WMMP Compliance Report in the future.
Importance	Moderate-High



KIA-NIRB-33

Review Comment Number	KIA-NIRB-33
Subject/Topic	Snowbank monitoring results
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Sections 2.4.2, 2.4.3.1, 2.4.3.2, 2.4.4.1 • Table 9; Figure 5; Table 10 • Appendix B: Hope Bay Roadside Snowbank Monitoring Data 2023 <p>Agnico Eagle, Hope Bay, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> • Section 3.1.5.2
Summary	The methods used to summarize snowbank monitoring results need to be more clearly explained, as several different averages appear to be reported, which are not directly comparable.
Detailed Review Comment	<p>The results of 2023 Snowbank Monitoring are difficult to understand and potentially misleading.</p> <p>First, Section 2.4.2 (Methods) of the 2023 WMMP Compliance Report states that snowbank height was monitored monthly from January through early May and October through December 2023. This monthly monitoring appeared to be inconsistent with Section 3.1.5.2 of the WMMP Plan, which states that snowbank height will be measured on Project roads twice per month. Appendix B (Hope Bay Roadside Snowbank Monitoring Data 2023) shows that measurements were taken twice a month. Writing should be edited for consistency.</p> <p>In the text of Section 2.4.3, Agnico Eagle states that the highest average snowbank height was 74.2 cm on 28 February 2023 at station SB3. However, Table 9 (generically named “2023 Snowbank Height Summary”) shows that the final average in February 2023 for station SB3 is 47.85 cm. Appendix B more clearly shows that SB3 had an east side average of 32 cm and 139.8 cm on 16 February and 28 February, respectively, and a west side average of 11 cm and 8.6 cm on the same dates. The 74.2 cm noted in text is thus an average of 139.8 cm and 8.6 cm only; while the 47.85 cm in Table 9 includes all</p>



	<p>four measurements. None of this is clearly explained in the main body of the 2023 WMMP Compliance Report.</p> <p>Furthermore, the east and west measures shown in Appendix B are already an average of five measurements, spaced 5 m apart, on each side. That means the east snowbank at SB3 averaged 139.8 cm over at least 20 m in length. Although the boxplots in Figure 5 do present outliers, including the 139.8 cm measurement, these maximum values are not discussed. There could have been snowbank measurements higher than this average; however, the raw data are not provided. These results also suggest that Agnico Eagle's claim that "<i>higher snowbanks were isolated to small portions of the road, i.e., across a few meters</i>" may need to be worded more accurately. Although it is unlikely that 20 m of an approximately 1.5 m snowbank would affect caribou travel, especially if it is not at a known road crossing location, Agnico Eagle should strive to present the results of snowbank monitoring in a clear, objectively written, and transparent way.</p> <p>The compiled snowbank program data from 2020-2023 are also confusing. Agnico Eagle states that the range in average height of snowbanks from all years and months was 0.0 – 25.3 cm in Section 2.4.3.2 (Results), but also states that the range in average height was 0.0 – 18.2 cm in Section 2.4.4.1 (Discussion). In both sections, Agnico Eagle states that the overall average snowbank height across all years and months was 9.8 cm, while Table 10 shows that the "All Years Compiled" mean height is 9.6 cm. Furthermore, Table 10 includes neither the 25.3 cm nor 18.2 cm maximum average height; thus, it is not possible for the reviewer to determine which value is correct.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please ensure that snowbank monitoring methods are reported accurately and in line with the WMMP Plan. There appeared to be an inconsistency in survey frequency (i.e., monthly vs. twice monthly) in 2023 that was only resolved upon reviewing Appendix B. • Please endeavour to report snowbank monitoring results clearly, including defining which averages are being used and reconciling values in text with values in tables. • Please confirm the compiled snowbank program average heights and ranges, as there is inconsistent information presented in Section 2.4.3.2 versus Section 2.4.4.1.
Importance	Moderate



KIA-NIRB-34

Review Comment Number	KIA-NIRB-34
Subject/Topic	Wildlife mortalities in 2023
References	<p>Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)</p> <ul style="list-style-type: none"> • Project Certificate No. 003, Revised Term and Condition No. 25 • Project Certificate No. 009, New Term and Condition No. 23 • Section 7.5, Furbearers (p. 7-8); Waterbirds and Shorebirds (p. 7-9) ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024) • Table 1, Wildlife Mortalities (p. xi) • Sections 3.7.3.2, 3.10.3.2, 3.8.3.2 • Appendix G: Wildlife Interactions, Incidents, and Mortalities • Recorded at the Project in 2023 • Appendix H: Hope Bay Incidental Wildlife Observations 2023
Summary	<p>There were five wildlife mortalities at the Project site in 2023 but only three were officially reported in the 2023 NIRB Annual Report and 2023 WMMP Compliance Report (the other two were identified from the Incidental Wildlife Observations log). The three reported wildlife mortalities were attributed to natural causes, but further rationale for these determinations is needed.</p>
Detailed Review Comment	<p>In response to PC No. 009, New TC No. 23 (Objective: To ensure that all direct wildlife mortalities are reported and considered in the development of adaptive management protocols), Agnico Eagle states that <i>“There were three wildlife mortalities recorded in 2023. None of the mortalities can be attributed to Project activity, all were due to natural causes.”</i> Agnico Eagle provided a similar summary for PC No. 003, Revised TC No. 25 in that <i>“There were no project related mortalities in 2023.”</i></p> <p>The wildlife mortality descriptions in both Section 7.5 of the 2023 NIRB Annual Report and the 2023 WMMP Compliance Report do not provide enough detail to justify Agnico Eagle’s interpretation of natural causes. For example:</p> <ul style="list-style-type: none"> • The single wolverine mortality in 2023 <i>“was deemed to be due to natural causes given that the carcass was located far away from infrastructure.”</i> There were no further details in Section 3.7.3.2 (Wolverine – Interactions, Incidents, and Mortalities) of the 2023 WMMP Compliance Report. However, Appendix G (Wildlife Interactions, Incidents, and Mortalities



	<p>Recorded at the Project in 2023) reveals that only the head remained. Is it typical for natural causes to result in this type of carcass distribution? Is it possible that the wolverine was harvested for its pelt?</p> <ul style="list-style-type: none"> An unidentified shearwater <i>“was located unable to move and was later found deceased. The individual died of natural causes due to exposure to the elements and was scavenged by ravens.”</i> There were no further details in Section 3.10.3.2 (Waterbirds – Interactions, Incidents, and Mortalities) or Appendix G of the 2023 WMMP Compliance Report. Although the shearwater’s ultimate death may have been exposure to the elements, what may have occurred to render it immobilized? The Event Description in Appendix G simply states that the individual was found “on site”. Was there a potential collision with a vehicle or building? Was the bird examined for injuries or illness? <p>The third reported wildlife mortality involved a red fox. This species is not mentioned in Section 7.5 of the 2023 NIRB Annual Report; however, Section 3.8.3.2 of the 2023 WMMP Compliance Report states, <i>“A dead red fox was seen being carried by another red fox on November 25, 2023. The red fox was believed to have died of natural causes.”</i> Appendix G provides additional observation details about both foxes, which appear to provide more support for ‘natural causes’ than the other two wildlife mortalities that occurred in 2023.</p> <p>Furthermore, Appendix H (Hope Bay Incidental Wildlife Observations 2023) of the 2023 NIRB Annual Report includes two additional mortalities not described in Appendix G or the applicable VEC sections of the 2023 WMMP Compliance Report. On 10 May 2023, an Arctic fox was found deceased <i>“beside rear door to Kitchen on top of snowbank”</i>, and on 29 July 2023, two unidentified songbirds were found deceased at Madrid sump 2. Were these carcasses examined for injury and cause of death? Could their deaths be related to Project activities?</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please provide further rationale for why the wolverine mortality was deemed to be due to natural causes. Distance from infrastructure, as an explanation, should be supported by other evidence gathered from the carcass condition. Please clarify if the shearwater mortality may have resulted from injuries due to Project activities, such as a collision with a vehicle or a building, disease, or other factors. Please specify where it was found “on site”.



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	<ul style="list-style-type: none"> • Please explain why the Arctic fox and unknown songbird mortalities were not reported in the 2023 NIRB Annual Report and WMMP Compliance Report (main body and Appendix G) and provide more information about their suspected causes of mortality. • Please submit wildlife for necropsies where their mortalities were caused by factors that remain uncertain. It is also important to the KIA that avian flu be investigated as contributing factors as Inuit harvest birds and the investigations into the spread of this illness are limited in the Arctic, though it is known to occur.
Importance	Moderate

KIA-NIRB-35

Review Comment Number	KIA-NIRB-35
Subject/Topic	Wildlife interactions: active ptarmigan nest
References	<p>Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)</p> <ul style="list-style-type: none"> • Section 7.5, Breeding Birds (p. 7-10) <p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <p>Table 1, Wildlife Interactions (p. x)</p> <ul style="list-style-type: none"> • Section 3.9.3.1 • Appendix G: Wildlife Interactions, Incidents, and Mortalities • Recorded at the Project in 2023 <p>Agnico Eagle, Hope Bay, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> • Section 3.1.10
Summary	An active ptarmigan nest was found in 2023. Agnico Eagle did not report on its location in relation to Project infrastructure or activities, nor on mitigation and monitoring measures that may have been implemented to protect the nest from disturbance or destruction.
Detailed Review Comment	In Section 7.5 of the 2023 NIRB Annual Report, Agnico Eagle describes one wildlife interaction in 2023 as involving “a single unknown species of ptarmigan flushed from their nest by site personnel.



	<p><i>The nest contained four eggs and was left for the bird to return to undisturbed.</i> No further details are available in Section 3.9.3.1 (Upland Breeding Birds – Interactions, Incidents, and Mortalities). The only additional detail in Appendix G is to indicate that personnel left the area immediately.</p> <p>The active ptarmigan nest and its eggs are protected under the Nunavut Wildlife Act, s.72. In addition, Section 3.1.10 of the WMMP Plan states that <i>“Should construction occur during the upland bird breeding period, then pre- construction surveys will be conducted, and any active nests will be appropriately buffered, monitored, and the fate of the nest reported.”</i> Please provide more information about where this ptarmigan nest was found (e.g., in proximity to Project activities) and whether any mitigation and monitoring measures were implemented.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide more information about the active ptarmigan nest found in 2023, including where it was found in proximity to Project activities, whether a no-disturbance buffer was set up around the nest, and whether the nest was monitored until it was no longer active.
Importance	Moderate

KIA-NIRB-36

Review Comment Number	KIA-NIRB-36
Subject/Topic	Wildlife camera program in ‘Ladder Area’ and Boston
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Section 3.2.1; Figure 7 <p>Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)</p> <ul style="list-style-type: none"> • Section 4
Summary	The wildlife camera monitoring program includes four zones: Treatment, Potential ZOI, Control, and ‘Ladder Area’ (at Madrid). If the Ladder Area south of Madrid is to become part of the Treatment zone in the future, the Potential ZOI zone should also be extended farther south, and cameras should be deployed in this extended ZOI zone and Control zone south of Madrid.
Detailed Review Comment	In Section 3.2.1 of the 2023 WMMP Compliance Report, Agnico Eagle describes four camera monitoring zones: Treatment Zone (<2



	<p>km from the Project), Potential Zone of Influence (ZOI; 2-10 km from the Project), Control Zone (>10 km from the Project), and an additional Ladder Area, <i>“which is part of the ZOI zone and will be included in the Treatment zone once Madrid is developed.”</i> As shown in Figure 7, the Ladder Area abuts (and slightly extends beyond) the original ZOI. If the Ladder Area is to become part of the Treatment zone in the future, should not the Potential ZOI also be extended 8 km farther south? That is, with respect to the camera monitoring program, should there not be additional cameras deployed south of the Ladder Area to act as ZOI and Control cameras?</p> <p>The KIA understands that the Hope Bay Project is currently in Care and Maintenance and that Madrid will not be developed in 2024, beyond <i>“General earthworks (e.g., pad, culverts, diversion berm) & portal development and advancement”</i> (Section 4 of the 2023 NIRB Annual Report). Thus, modifying the camera monitoring design may not be needed immediately but this should be considered in the future when the Project status changes. Similarly, the lack of planned construction at Boston is the reason why Agnico Eagle is planning to discontinue the Boston camera program beginning in spring 2024 (Section 3.2.1 of the 2023 WMMP Compliance Report). Agnico Eagle states that <i>“the cameras will be redeployed prior to the onset of any construction in the Boston area.”</i></p> <p>The KIA requests that Agnico Eagle redeploy cameras at Boston and consider additional cameras south of the Ladder Area at Madrid at least one year prior to planned construction at each site.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please explain whether the potential ZOI camera monitoring zone will be expanded south when the ‘Ladder Area’ becomes part of the Treatment zone. • Please consider deploying additional cameras south of the Ladder Area to act as true ZOI and Control cameras. These cameras should be set up at least one year prior to planned construction at Madrid. • If the Boston camera program will be discontinued until Project activities resume at the site, please commit to redeploying cameras at least one year prior to planned construction.
Importance	Moderate



Review Comment Number	KIA-NIRB-37
Subject/Topic	Facilities cameras and Roberts Bay waste management
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> Sections 3.6.3.1, 3.6.3.2 Appendix E: Camera Summary of Wildlife Images and Events, Doris and Madrid Areas, September 2021 to September 2023 Appendix A: Detailed Methodology for the Hope Bay Project Programs, 2023
Summary	<p>The Roberts Bay Waste Management Facility (WMF) moved locations and it is unclear if one or both facilities monitoring cameras were also relocated. It is also unclear where the Roberts Bay 'waste sorting area', where a grizzly bear interaction occurred in 2023, is located relative to the WMF and if there is a camera set up to monitor this waste sorting area.</p>
Detailed Review Comment	<p>In Section 3.6.3.1, Agnico Eagle explains that the Roberts Bay Waste Management Facility (WMF) changed locations in 2022 and the camera that was responsible for monitoring the WMF subsequently moved. The new location is outside of the composter (to be commissioned in 2024; see Section 4.1 of the 2023 NIRB Annual Report) and in the general entrance pathway for the WMF. However, there were previously two cameras monitoring the WMF (Cameras 18 and 21) – was only one or both cameras moved to the new location?</p> <p>Agnico Eagle also states that no grizzly bears were captured on camera in proximity to the WMF in the most recent monitoring period (September 2022 – September 2023). Appendix E may contradict this statement, as there were four grizzly bear events captured on Camera 21. However, these events may have occurred prior to September 2022 (see review comment 'KIA-NIRB-32: Camera monitoring reporting periods'). Agnico Eagle should confirm which camera was moved and when the grizzly bear events shown in Appendix E occurred.</p> <p>In Section 3.6.3.2, Agnico Eagle describes a wildlife interaction where "a grizzly bear entered the waste sorting area in Robert's Bay throughout the night and tore apart the waste receptacles." Please clarify where this waste sorting area is in relation to the WMF and the two facilities monitoring cameras. Would it be appropriate to move (or add) a camera facing this area? The KIA understands that corrective actions (re-emphasizing proper waste management/segregation) were made and there were no further incidents at this waste sorting area in 2023. However, can Agnico</p>



	<p>Eagle confirm if there had been previous wildlife interactions to support expanding the Facilities Camera Monitoring program to include this location?</p> <p>Note that in Appendix A (Detailed Methodology for the Hope Bay Project Programs, 2023), Photos 3.1-7 and 3.1-8 showing an example of the monitoring view of Camera 21 and 18, respectively, are still of the original setup (the images are from 2017). In addition, the example images for Camera 51 (Photos 3.1-12 and 3.1-13) are from 2016 and 2017 with the captions indicating “<i>future site of the South Dam of the TIA</i>” (which has since been built). Please provide updated example images for any relocated cameras and for site conditions (including infrastructure) that have changed.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please clarify if both Cameras 18 and 21 were moved to the new location of the Roberts Bay Waste Management Facility. • Please clarify if the grizzly bear detections on Camera 21, as shown in Appendix E, occurred during this 2022-2023 monitoring period. • Please clarify the location of the Roberts Bay ‘waste sorting area’ in relation to the Waste Management Facility and cameras. • Please confirm if there had been previous wildlife interactions at the Roberts Bay waste sorting area, to inform whether the Facilities Camera Monitoring program may need to be expanded. • Please provide updated examples of the monitoring views for relocated cameras and modified site conditions/infrastructure.
Importance	Moderate

KIA-NIRB-38

Review Comment Number	KIA-NIRB-38
Subject/Topic	Inaccurate reporting of wildlife observations/detections
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Sections 3.5.3.1, 3.7.3.1, 3.8.3.3, 3.8.4, 3.11.7.2, 3.11.8 • Tables 20, 31, 35 • Photo 13



	<ul style="list-style-type: none"> Appendix H: Hope Bay Incidental Wildlife Observations 2023
Summary	<p>Some numbers and months of wildlife observations and camera detections are inconsistently reported for muskox, wolverine, potential nest predators, and raptors. Therefore, it is unclear if data may be missing from summaries and/or analyses.</p>
Detailed Review Comment	<p>There are minor inaccuracies and discrepancies throughout the 2023 WMMP Compliance Report regarding the number of wildlife observations/detections and when they occurred. For example:</p> <ul style="list-style-type: none"> Section 3.5.3.1 – Agnico Eagle states in the text that eight unique muskox camera events occurred between the beginning of May and end of August 2023. Table 20 supports a total of eight muskox events but indicates that one of these detections occurred in September 2023 (not August). Section 3.7.3.1 – Agnico Eagle states that wolverine camera events were recorded from March to August 2023. Photo 13, showing a wolverine captured on ZOI zone Camera 23, indicates that the image was taken on 25 September 2022. Section 3.8.3.3 – Agnico Eagle states that 56 incidental sightings of potential nest predators were recorded in 2023. The number of sightings in Table 31 also adds up to 56. However, Section 3.8.4 (Discussion) mentions only 53 sightings. Section 3.11.7.2 – Agnico Eagle states that a total of 39 raptors were reported in 25 sightings between April and November. However, the next sentence with a breakdown of raptor sightings only adds up to 24 (10 eagles + 6 peregrine falcon + 6 ravens + 1 rough-legged hawk + 1 snowy owl). Both Table 35 (which adds up to 25 sightings) and Section 3.11.8 (Discussion) mention raptors being observed between April and September, not November. However, Appendix H indicates there were four additional raven sightings between 26 October and 18 November 2023. <p>While these inaccuracies may not meaningfully change the results, the reviewer is again left wondering if data are missing from the summaries and analyses and is less confident in the QA/QC process for analysis and reporting for the Project. Please endeavour to present complete, accurate, and consistent results in future WMMP Compliance Reports.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please explain why the numbers and months of wildlife observations/detections are inconsistent for muskox,



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	<p>wolverine, potential nest predators, and raptors (as described in the Detailed Review Comment).</p> <ul style="list-style-type: none"> Please endeavour to present complete, accurate, and consistent results in future WMMP Compliance Reports.
Importance	Moderate

KIA-NIRB-39

Review Comment Number	KIA-NIRB-39
Subject/Topic	Caribou Height of Land Monitoring SOP
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> Section 3.4.2.3 Appendix Z: Caribou Height of Land Monitoring SOP <ul style="list-style-type: none"> Sections 2.1, 2.2, 3.1 <p>Agnico Eagle, Hope Bay, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> Section 3.1.6.2
Summary	The KIA requests clarification on the triggers for monitoring and potential triggers for management in the new Caribou Height of Land Monitoring SOP finalized in March 2023.
Detailed Review Comment	<p>The Caribou Height of Land (HOL) Monitoring SOP was finalized in March 2023 in collaboration with the IEAC (Section 3.4.2.3 of the 2023 WMMP Compliance Report). The triggers for monitoring are outlined in Section 2.1 of the Caribou HOL Monitoring SOP. These triggers include reported sightings of 25 or more individual caribou within 5 km of project activities (including all site facilities and Project roads) in a 24-hour period. Caribou activity provided by the Cambridge Bay Hunters and Trappers Organization (HTO), such as local reports or caribou collar data available to the HTO, may also trigger monitoring.</p> <p>The KIA wishes to confirm the details of these updated triggers compared to the most recent WMMP Plan (January 2023), Section 3.1.6.2, which states: <i>"Surveys will occur at regular intervals: 1. During spring and fall migration, when data indicate that the majority of road crossing events occur, and 2. When local observations or radio-collar data indicate that caribou are within 10 km of Project roads."</i> For clarity, please confirm if reported caribou sightings at the Project are applicable year-round and not only during spring and fall migration. Please also clarify if there is a distance or group size trigger with</p>



	<p>respect to information provided by the HTO; and if Agnico Eagle will also be monitoring caribou collar data separately.</p> <p>Section 3.1 of the Caribou HOL Monitoring SOP notes that <i>“Additional monitoring should be conducted if groups of caribou (e.g., >10 individuals) are reported near site activities or roads.”</i> Please clarify if the “e.g.” should be an “i.e.” – is >10 individuals the prescribed threshold? Furthermore, it is unclear what is meant by “additional monitoring”. Is this a trigger for HOL monitoring; that is, should this statement be included in Section 2.1 (Monitoring Initiation) instead? Or does the statement belong in Section 2.2 with respect to conditions where HOL monitoring will continue? Or does “additional monitoring” refer to other types of monitoring aside from HOL surveys?</p> <p>Section 4 (Data Processing and Reporting) includes reporting on <i>“any management or mitigation actions undertaken, including outcomes and communications with stakeholders.”</i> The Caribou HOL Monitoring SOP does not include a section on triggers for mitigation so it is unclear what types of management or mitigation actions may occur based on HOL monitoring results. Section 3.1.6.2 of the WMMP Plan states that the <i>“results from these [HOL] and the snow track surveys will be combined with collar data and analyzed periodically with the objective of evaluating caribou behaviour in relation to roads and wildlife crossing structures.”</i> Does this analysis plan still apply, or has it changed based on the 2021-2023 IEAC workshops?</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please confirm if reported caribou sightings at the Project would trigger caribou height of land (HOL) surveys year-round. • Please clarify if there is a distance or group size trigger for HOL monitoring with respect to caribou activity information provided by the Cambridge Bay HTO. • Please clarify if Agnico Eagle will also be monitoring/analyzing caribou collar data to trigger HOL monitoring. • Please clarify what is meant by “additional monitoring” in the first bullet of Section 3.1 of the Caribou HOL Monitoring SOP, and if “>10 individuals” is meant to define groups of caribou for this additional monitoring. • Please explain how HOL monitoring results could trigger management or mitigation actions, and the timeline that such adaptive management could occur (immediately, after annual review, etc.).
Importance	Moderate



KIA-NIRB-40

Review Comment Number	KIA-NIRB-40
Subject/Topic	Revegetation studies and monitoring
References	<p>Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)</p> <ul style="list-style-type: none"> • Project Certificate No. 009, New Term and Conditions No. 18, No. 8 • Appendix C-1 <p>Agnico Eagle, Hope Bay Project, Doris-Madrid Interim Closure and Reclamation Plan (January 2024)</p> <ul style="list-style-type: none"> • Section 5.4 <p>Agnico Eagle, Meliadine Gold Mine, 2021 Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Appendix 31: 2021 Natural recovery and active restoration of tundra plant-soil systems report (March 2022)
Summary	Lessons learned from recent natural and active revegetation studies conducted by University of Saskatchewan researchers at the Meliadine Mine (for Agnico Eagle) should be trialed at the Hope Bay Project. The decommissioned Windy Camp offers a good opportunity for progressive reclamation and revegetation activities.
Detailed Review Comment	<p>During the 2023 NWB Annual Report review process, the KIA requested that Agnico Eagle commit to activities that promote natural revegetation and consider active revegetation efforts at the decommissioned Windy Camp.¹ As Agnico Eagle has provided further information about revegetation studies as part of the 2023 NIRB Annual Report (in response to PC No. 009, New TC No. 18), the KIA wishes to add to our previous review.</p> <p>In their comments to address PC No. 009, New TC No. 18; 2006 Vegetation Commitments No. 8 and 9; and 2006 Caribou Commitments No. 12 and 17; Agnico Eagle claims that “natural revegetation is already promoted” at Hope Bay. Agnico Eagle refers to natural recovery and active restoration studies completed by University of Saskatchewan researchers at the Meliadine Mine from</p>

¹ See review comment KIA-NWB-37 In <ftp://ftp.nwboen.ca/registry/2%20MINING%20MILLING/2A/2AM%20%20Mining/2AMDOH1335%20AEM/3%20TECH/B%20GENERAL/4%20ANNUAL%20RPT/2023/240604%20AM-DOH1335%2C%20AM-BOS1835%2C%202BB-MAE1727%2C%202BB-OS1727%2C%202BE-HOP2232%202023%20Annual%20Report%20KIA%20comments-ILAE.pdf>



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	<p>2018 to 2022 (NIRB Public Registry Document ID 338868), and states that <i>“Hope Bay will also require additional assessment for nature [sp] revegetation during closure activities.”</i></p> <p>The KIA notes that New TCs No. 8 and 18 include progressive reclamation efforts, which do not need to be initiated upon Project Closure but <i>“will take place as opportunities arise”</i> (Section 5.4, Doris-Marid Interim Closure and Reclamation Plan). Reclamation of Windy Camp is one such opportunity to apply learnings from the Meliadine revegetation studies and to monitor restoration success. The KIA understands that Meliadine and Hope Bay are in the Southern Arctic Ecozone but in different ecoregions (45: Maguse River Upland vs. 39: Queen Maud Gulf Lowland), which could affect the suitability of revegetation techniques. However, it would still be worthwhile to conduct a pilot study at Hope Bay to promote revegetation and determine if site-specific protocol adjustments need to be made.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please confirm if Agnico Eagle will apply the recommendations from the Meliadine revegetation studies to the Hope Bay Project. If so, please specify when these revegetation efforts will take place. • Please consider a revegetation pilot study at the decommissioned Windy Camp as part of the progressive reclamation efforts outlined in New Term and Conditions No. 8 and 18.
Importance	Moderate

KIA-NIRB-41

Review Comment Number	KIA-NIRB-41
Subject/Topic	Additional comments on Shipping Management Plan
References	<p>Agnico Eagle, Hope Bay, 2023 NIRB Annual Report (April 2024)</p> <ul style="list-style-type: none"> • Project Certificate No. 009, New Term and Condition No. 31 <p>Agnico Eagle, Hope Bay Project, Shipping Management Plan (March 2024)</p> <ul style="list-style-type: none"> • Section 2.1; Figures 2-1, 2-2 • Appendix A: Materials Provided to Vessel Operators <p>Agnico Eagle, Hope Bay, Shipping Management Plan (February 2023)</p> <ul style="list-style-type: none"> • Appendix A: Materials Provided to Vessel Operators



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Summary	There are additional Important Bird Areas (also considered candidate Key Biodiversity Areas) along the Project's shipping route that should be included on the key seabird habitat map in the Shipping Management Plan. Agnico Eagle should provide clarification on the additional materials provided to vessel operators.
Detailed Review Comment	<p>In addition to our review comments noted in 'KIA-NIRB-26: Marine mammal monitoring program', the KIA has two recommendations and comments for Agnico Eagle to improve the Shipping Management Plan.</p> <p>Agnico Eagle's comments to PC No. 009, New TC No. 31 state that the maps of key marine bird habitats and sensitive marine mammal habitats were most recently updated in March 2024. However, the map legends in Figures 2-1 and 2-2 in the 2024 Shipping Management Plan indicate that they were last updated 21 January 2023. Is there additional/updated information that needs to be incorporated into these maps? The KIA recommends including areas identified as Important Bird Areas (IBAs), which are currently in the process of being converted into Key Biodiversity Areas (KBAs). Most IBAs align with the key habitats already included on Figure 2-1; however, a notable omission is Jenny Lind Island, which is located along the Project's shipping route between the southeastern end of Victoria Island (currently mapped as a 'moderately risk intolerant site') and the Nordenskjöld Islands (a 'highly risk intolerant site'). Jenny Lind Island is considered Nationally and Globally Significant due to its arctic goose colonies. In addition, the mapped IBA for Northwestern Brodeur Peninsula consists of more than the three small inland polygons identified by (ECCC, 2016); the IBA is a larger polygon including areas closer to the coast, where at-risk Ivory Gulls (federally Endangered and Critically Imperiled in Nunavut) could potentially be disturbed by Project shipping activities in the Parry Channel.</p> <p>Appendix A of the updated Shipping Management Plan only includes Reporting information. Please confirm if the additional materials attached to the previous 2023 Shipping Management Plan, including the Incidental Marine Wildlife Sightings Form, Hope Bay Shipping Management Plan Awareness (slide presentation), Seabird and Marine Mammal ID Guides, and Marine Mammals and Seabird Incident Report form, are still provided to vessel operators.</p>
Recommendation/Request	The KIA requests the following:



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	<ul style="list-style-type: none"> • Please clarify if the key seabird and marine mammal habitat maps in the Shipping Management Plan should have been updated in 2024. • Please include Jenny Lind Island and revise mapping for the Northwestern Brodeur Peninsula on Figure 2-1. These Important Bird Areas are located along the Project's shipping route. • Please confirm if vessel operators are still provided with additional materials associated with the Shipping Management Plan, such as marine wildlife ID guides and sightings and incident reporting forms.
Importance	Moderate

KIA-NIRB-42

Review Comment Number	KIA-NIRB-42
Subject/Topic	Security of dustfall canisters
References	Nunami Stantec Limited, Q1-Q3 2023 Atmospheric Compliance Monitoring Program Report – Doris and Madrid Projects (March 2024) <ul style="list-style-type: none"> • Section 4.2.1, Table 4-5
Summary	Dustfall canisters fell from their stands in August and September 2023 due to wind or bears, resulting in data missing from 50% of the sampling stations during these months. Agnico Eagle should describe measures that can be taken to prevent data loss in the future.
Detailed Review Comment	One of the notes under Table 4-5 (Summary of Measured Dustfall Levels from Canister Sampling in 2023 – Doris Site) indicates that <i>"Samples were not submitted to the external laboratory for analysis as the jars had fallen from the stands either due to wind or bears."</i> These fallen jars resulted in loss of canister sampling dustfall data at three sampling stations in August and three (different) stations in September (out of six stations total; 50% failure each month). Are wind and bear damage recurring problems for the monitoring program? If so, what measures have Agnico Eagle taken, or will consider taking, to prevent data loss in the future?
Recommendation/Request	The KIA requests the following: <ul style="list-style-type: none"> • Please devise measures to secure dustfall canisters from falling due to wind and bears.
Importance	Moderate



KIA-NIRB-43

Review Comment Number	KIA-NIRB-43
Subject/Topic	Assessing compliance to Canadian Ambient Air Quality Standards
References	<p>Nunami Stantec Limited, Q1-Q3 2023 Atmospheric Compliance Monitoring Program Report – Doris and Madrid Projects (March 2024)</p> <ul style="list-style-type: none"> Sections 1, 4.3.2, 4.4 <p>Nunami Stantec Limited, Winter 2022-2023 Atmospheric Compliance Monitoring Report – Doris and Madrid Projects (October 2023)</p>
Summary	<p>Agnico Eagle states that explicit comparison and assessment of compliance to Canadian Ambient Air Quality Standards (CAAQS) is not possible at this time, partly due to insufficient monitoring data (<3 years) and partly due to the Project's annual reporting structure (not by calendar year). When three years of continuous data are available, Agnico Eagle should produce a supplemental report that addresses CAAQS compliance assessment requirements.</p>
Detailed Review Comment	<p>In Sections 4.3.2 (PM2.5) and 4.4 (NO2), Agnico Eagle states that comparison to the CAAQS requires data from <i>“three consecutive calendar years, with a valid comparison requiring valid data for a minimum of two of the three years. Since the data presented in this report is for a single year and is not based on a calendar year, comparison to the CAAQS is provided for informational purposes only; not to assess compliance.”</i></p> <p>The KIA understands that Agnico Eagle commissioned new continuous monitors measuring Total Suspended Particulate (TSP) and PM2.5 in November 2021 and decommissioned the Partisol non-continuous samplers previously used (Section 1). Thus, three years of continuous data would not be available until after November 2024. Please confirm if Agnico Eagle intends to submit future supplemental reports based on calendar year (in addition to standard Q1-Q3 and Winter reports, the latter of which include a full year of monitoring data), such that compliance to the CAAQS can be assessed.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please confirm if future AQMP reporting will include reports based on calendar year, such that measures of PM2.5 and NO2 can be explicitly compared, and assessed for compliance, to CAAQS.
Importance	Moderate



KIA-NIRB-44

Review Comment Number	KIA-NIRB-44
Subject/Topic	Fuel transfer risk assessment
References	<p>Agnico Eagle, Hope Bay Project, Oil Pollution Prevention Plan (OPPP) and Oil Pollution Emergency Plan (OPEP) (March 2024)</p> <ul style="list-style-type: none"> • Schedules 9, 1 • Section 2.20
Summary	<p>The 2020 fuel transfer risk assessment is out of date but also includes content that requires clarification from Agnico Eagle. More information is needed regarding the risk assessment rankings, why application of controls increased risk in some cases, missing potential outcomes, and how worker fatigue can be mitigated.</p>
Detailed Review Comment	<p>Although the annual fuel transfer risk assessment in Schedule 9 is out of date (see review comment 'KIA-NIRB-25: Major revisions needed for OPPP/OPEP'), the KIA has some comments regarding presentation, risk levels, and current controls in case Agnico Eagle plans to adopt TMAC's assessment in future years.</p> <p>First, the risk assessment tables copied into Schedule 9 are of poor quality/resolution and difficult to read. It would also be helpful if a key/legend was provided for the rankings, especially for Risk Level. Based on the values included (and discernable), the transition from Medium to High risk occurs between ranks 13 and 14, and Critical risk may occur at rank 18. Please explain what the range of potential values means, including example scenarios.</p> <p>Second, there are two sets of columns for Likelihood of Occurrence, Consequence, and Risk Level. It is assumed that the second set are the mitigated or residual rankings after the Current Controls (including Elimination, Substitution, Engineering, Admin, and PPE) are applied. However, there are a few identified risks where the mitigated/residual risks are higher than before. For example, ID #6 (Hazard/Risk = Barge Positioning & Jetty; Potential Outcome = Fire/Explosion) has an inherent consequence of rank 3 (Moderate) but increases to rank 4 (Major) after current controls are applied. The risk level for this hazard remains at Medium but the ranking has also increased from 9 to 10 (worse). The same changes occur for ID #9 (Hazard/Risk = Barge Positioning & Jetty; Potential Outcome = Damage/Spill/Fire/Incident). Please explain why mitigation measures would exacerbate the risks rather than reduce them.</p>



	<p>There are six hazards/risks for “Emergency Spill Response Land/Water” (IDs #29-34) without information in the Potential Outcome column. They appear to have the same inherent and mitigated risk rankings; however, different controls are described. Please clarify what the differences are for these row/risks. Note that IDs #28 (Fully Fueled Tank Management) and #35 (Day/Night) are also missing Potential Outcomes.</p> <p>Worker fatigue is indicated as a Potential Outcome for risk ID #26 ((Over Water) Transferring Fuels) and the actual Hazard/Risk for ID #36. For the former, the inherent rankings for Likelihood of Occurrence, Consequence, and Risk Level are 3 (Possible), 4 (Major), and 18 (Critical), respectively. After applying the Administrative control of “<i>Review and revision of TMAC Bulk Fuel Transfer Procedure</i>”, the risk assessment dropped to 2 (Unlikely), 1 (Low), and 2 (Low). It is unclear how the current Bulk Fuel Transfer Procedure, presented in Schedule 1, addresses worker fatigue. The only related information is in Section 5.1 (Agnico Eagle Fuel Transfer Team): “<i>Depending on the amount of fuel to be transferred, the operation may extend continuously over several days, necessitating round-the-clock shifts to manage and monitor the transfer. Each shift and its required complement of team members is managed on the Assigned Roles and Responsibilities Schedule.</i>” However, there are no further details about maximum shift length, scheduled breaks, etc. to prevent or reduce worker fatigue. In the main body of the OPPP/OPEP, the only details related to worker fatigue occur in Section 2.20 (Leak Monitoring): “<i>The monitors may be reduced to one person to allow for rest breaks and other necessary functions when the line is running normally.</i>”</p> <p>Risk ID #36 includes more details about controls to combat worker fatigue due to the 24-hour transfer time. Engineering controls include “work relief to be supplied when required” and Administrative controls include “Breaks provided, snacks, etc.” in addition to reviewing and revising the Bulk Fuel Transfer Procedure, command center, and something else illegible. The mitigated/residual risk assessment for ID #36 is also more realistic, changing from 3 (Possible), 3 (Moderate), and 13 (Medium) to 2 (Unlikely), 3 (Moderate), and 3 (Moderate) for Likelihood of Occurrence, Consequence, and Risk Level, respectively. Measures to prevent or reduce worker fatigue should be directly incorporated into the Roberts Bay OHF Bulk Fuel Transfer Procedure.</p>
<p>Recommendation/ Request</p>	<p>The KIA requests the following:</p>



	<ul style="list-style-type: none"> • Please provide a higher quality, legible version of the annual fuel transfer risk assessment during future annual reporting and updates of the OPPP/OPEP. • Please provide a key/legend explaining the numerical and categorical rankings presented for Likelihood of Occurrence, Consequence, and Risk Level. Example scenarios would be helpful. • Please explain why application of controls would increase, rather than decrease, certain identified risks (see IDs #6 and #9 in Schedule 9). If this is an error, please correct these risk assessments in the future. • Please ensure Potential Outcomes are included for all identified risks. It is unclear how the various “Emergency Spill Response Land/Water” risks differ in Schedule 9. • Please ensure that measures to prevent or reduce worker fatigue are included in the OPPP/OPEP and/or Bulk Fuel Transfer Procedure. Worker fatigue was identified as a Critical risk in TMAC’s 2020 annual fuel transfer risk assessment review.
Importance	Moderate

KIA-NIRB-45

Review Comment Number	KIA-NIRB-45
Subject/Topic	Updated ECCC-CWS guidance for emergency wildlife response
References	<p>Agnico Eagle, Hope Bay Project, Oil Pollution Prevention Plan (OPPP) and Oil Pollution Emergency Plan (OPEP) (March 2024)</p> <ul style="list-style-type: none"> • Section 1.8.5 • Schedule 13 <p>Agnico Eagle, Hope Bay Project, Spill Contingency Plan (March 2024)</p> <ul style="list-style-type: none"> • Section 2.4.10 • Appendix 4
Summary	ECCC-CWS published several guidance documents in 2022 regarding emergency wildlife response. Agnico Eagle should incorporate the updated guidance into the OPPP/OPEP and Spill Contingency Plan.
Detailed Review Comment	Schedule 13 of the OPPP/OPEP presents a Draft June 2012 version of the Canadian Wildlife Service (CWS) Response Plan Guidance for Birds and Oil. The KIA has previously commented extensively on mitigation of impacts to wildlife and birds during annual reviews of



	<p>the Hope Bay Spill Contingency Plan (Appendix 4). Please endeavour to align the OPPP/OPEP (Section 1.8.5 and relevant appendices) and the Spill Contingency Plan (Section 2.4.10 and relevant appendices) with respect to environmental sensitivities. During the 2023 Nunavut Water Board (NWB) Annual Report review process, the KIA noted that ECCC-CWS recently released Guidance and Protocols for Wildlife Surveys for Emergency Response in 2022, and requested that Agnico Eagle incorporate these protocols into the wildlife assessment survey SOPs associated with the Spill Contingency Plan.²</p> <p>Since the CWS Response Plan Guidance includes other procedures besides wildlife monitoring/surveys, Agnico Eagle should also be aware of ECCC- CWS's 2022 updated Guidelines for Wildlife Response Plans and Guidelines for the Capture, Transport, Cleaning, and Rehabilitation of Oiled Wildlife. In addition, Section 4.5.5 of the former document indicates that ECCC-CWS is currently developing revisions and updates for guidance to conduct activities related to wildlife deterrence and dispersal. Thus, additional guidance may be forthcoming and should be reviewed and incorporated into the OPPP/OPEP and Spill Contingency Plan when available.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please incorporate the 2022 updated ECCC-CWS guidance for emergency wildlife response into the OPPP/OPEP and Spill Contingency Plan.
Importance	Moderate

KIA-NIRB-46

Review Comment Number	KIA-NIRB-46
Subject/Topic	Species of conservation concern
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> Sections 3.2.4, 3.4 Table 11
Summary	The NatureServe database and/or Arctic Ocean rankings from the <i>Wild</i>

² See review comment KIA-NWB-43 in <ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1335%20AEM/3%20TECH/B%20GENERAL/4%20ANNUAL%20RPT/2023/240604%20AM-DOH1335%2C%20AM-BOS1835%2C%202BB-MAE1727%2C%202BB-OS1727%2C%202BE-HOP2232%202023%20Annual%20Report%20KIA%20comments-ILAE.pdf>



	<p><i>Species: The General Status of Species in Canada</i> report series has supplemental conservation status information about species of conservation concern known to occur in the Hope Bay study area.</p>
Detailed Review Comment	<p>Table 11 of the 2023 WMMP Compliance Report summarizes the species of</p> <p>conservation concern known to occur in the Hope Bay study area. The Nunavut (General Status) ranking for each species was pulled from the <i>Wild Species: The General Status of Species in Canada</i> report series produced by the Canadian Endangered Species Conservation Council (CESCC). While the CESCC's 2022 report/dataset is a valuable resource, it has some limitations with respect to wildlife in Nunavut. For example, 'Caribou (<i>Rangifer tarandus</i>)' is a single entry and does not distinguish the various herds/populations. This general record has a S3S4 (Vulnerable-Apparently Secure) status in Nunavut and was applied to both the Dolphin and Union herd and the Beverly/Ahiak herd in Table 11. Other wildlife species, especially marine mammals, are not listed in the CESCC report as occurring in Nunavut, as indicated by 'Not Present' entries in Table 11. However, these species are listed under Eastern Arctic Ocean (EAO) and Western Arctic Ocean (WAO) and their statuses could be applied for the Hope Bay Project.</p> <p>The KIA notes that the NatureServe database has more rankings for species, subspecies, and populations in Nunavut and recommends using NatureServe as an additional resource for conservation statuses. The Nunavut rankings in Table 11 for the following species of conservation concern would be amended using information from NatureServe (hyperlinks provided):</p> <ul style="list-style-type: none"> • Caribou (Dolphin and Union), <i>Rangifer tarandus</i> pop. 16 – Imperiled (S2) • Caribou (Beverly/Ahiak), <i>Rangifer tarandus groenlandicus</i> – Vulnerable (S3) • Beluga (Eastern High Arctic-Baffin), <i>Delphinapterus leucas</i> pop. 6 – Vulnerable (S3) • Bowhead Whale (Bering-Chukchi-Beaufort), <i>Balaena mysticetus</i> pop. 2 – not listed in NU, Apparently Secure (S4) in NWT. However, from CESCC (2022), Bowhead Whale is listed as Vulnerable (S3N) in the Western Arctic Ocean. • Bowhead Whale (Eastern Canada-West Greenland), <i>Balaena mysticetus</i> pop. 6 – Vulnerable (S3) • Killer Whale, <i>Orcinus orca</i> – Imperiled (S2) • Narwhal, <i>Monodon monoceros</i> – Vulnerable (S3) • Ringed Seal, <i>Pusa hispida</i> – Apparently Secure (S4)



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Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please incorporate territorial status information from the NatureServe database and/or Arctic Ocean rankings from the CESSC's <i>Wild Species: The General Status of Species in Canada</i> report series when reporting on species of conservation concern.
Importance	Low

KIA-NIRB-47

Review Comment Number	KIA-NIRB-47
Subject/Topic	Caribou interactions with the TIA
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> Sections 3.4.3.2, 3.4.4.2, 3.6.3.1 (Facilities Camera Monitoring)
Summary	A caribou was detected on camera potentially (or likely) interacting with the ground at the TIA. Follow-up investigations, such as vegetation sampling for contaminants, should be considered.
Detailed Review Comment	<p>Wildlife Cameras 51 and 52 are deployed to capture potential wildlife interactions with the Tailings Impoundment Area (TIA). Twenty-one caribou events occurred at Camera 51 on the south end of the TIA in 2023 (Section 3.4.3.2, p. 43). Agnico Eagle describes <i>"One event lasting approximately three minutes showed a lone adult male caribou stopped with its head down in front of the camera. Due to its location in the camera field of view it is unclear what the caribou was doing in the event (Photo 3)."</i> Later, in the Discussion (Section 3.4.4.2), Agnico Eagle acknowledges that <i>"it appears that the caribou may be interacting with the ground below the camera"</i> but states that caribou have not been shown to be attracted to, or more likely to interact with, the TIA since the majority of camera events and incidental sightings of caribou were not at the TIA.</p> <p>Although a population-level effect of the TIA on caribou has not yet been found, Agnico Eagle's description of this caribou camera event may be dismissive of potential individual or wildlife health effects. For other wildlife VECs, Agnico Eagle appears to use the wording of <i>"interacting directly with the ground"</i> at Camera 51 as an indicator of wildlife interactions with the TIA (see Grizzly Bear – Facilities Camera Monitoring Results in Section 3.6.3.1). Therefore, the caribou was likely directly interacting with the</p>



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	ground/TIA. Was there a follow-up site visit to the area around Camera 51 to identify what the caribou may have been doing or feeding on? Would it be feasible to collect vegetation samples in the area to test for contaminants?
Recommendation/ Request	The KIA requests the following: <ul style="list-style-type: none"> Please consider additional investigations, such as vegetation sampling and contaminant testing, of the area where a caribou was detected on camera interacting with the TIA.
Importance	Low

KIA-NIRB-48

Review Comment Number	KIA-NIRB-48
Subject/Topic	Caribou herd identification
References	ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024) <ul style="list-style-type: none"> Sections 3.4.2.2, 3.4.3.2, 3.4.4.2 (Caribou Herd Identification) Appendix AA: Caribou Identification Presentation 2023 Appendix F: Wildlife Events Recorded by Wildlife Cameras, Doris and Madrid Areas, September 2021 to September 2023 Appendix L: Wildlife Events Recorded by Wildlife Cameras, Boston Project, September 2021 to September 2023
Summary	Caribou herd identification of camera images began in 2023. Retroactive analyses of wildlife camera data could improve the power of future analyses of seasonal occurrence trends. Agnico Eagle should also consider including Peary caribou in a future update of the caribou ID guide; there were two suspected (but unconfirmed) Peary caribou detections in 2023.
Detailed Review Comment	<p>The KIA is pleased to see the new Caribou Herd Identification analyses, developed with the IEAC, as part of the Wildlife Camera Program. In the Discussion (Section 3.4.4.2, p. 58), Agnico Eagle states that <i>“Additional years of herd identification data will provide better trends in the seasonal occurrence of both herds, in particular the less common Dolpib [sp] and Union caribou.”</i> Does Agnico Eagle have plans to conduct retroactive herd identification on existing camera data from 2016-2022? This work would also contribute to a better understanding of seasonal occurrence trends.</p> <p>Furthermore, it may be worthwhile to include Peary caribou in the ID guide (Appendix AA). There two caribou events recorded on wildlife cameras where the animal was suspected of being Peary caribou: one</p>



	<p>detection of two individuals captured on Camera 23 on 5 June 2023 (Appendix F, Doris- Madrid), and one detection of two individuals captured on Camera 81 on 25 May 2020 (Appendix L, Boston). Although Peary caribou are rarely observed around the Project site, the Hope Bay study area is included amongst the areas of additional sightings of Peary caribou outside the core range for the Banks-Victoria subpopulation (COSEWIC, 2015). As Peary caribou are a species at risk (Threatened under Schedule 1 of the federal Species at Risk Act and by COSEWIC; Imperiled (S2) in Nunavut according to NatureServe), it is important to keep track of when and where Peary caribou overlap with the Project area. To do this, it is important to be able to accurately identify Peary caribou from both wildlife camera data and on the ground (i.e., incidental observations).</p> <p>The suspected Peary caribou in the 2020 and 2023 camera data were not reported in Section 3.2.4 (Species of Conservation Concern) of the 2023 WMMP Compliance Report, perhaps because the species identification was uncertain. Since Agnico Eagle will be providing unknown caribou classifications (Beverly/Ahiak or Dolphin and Union) to the IEAC for identification assistance (Section 3.4.3.2), perhaps the suspected Peary caribou images can also be provided to the IEAC for their input.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please consider undertaking retroactive caribou herd identification analyses of wildlife camera data to improve the power of future analyses of seasonal occurrence trends. • Please consider including Peary caribou in a future update of the caribou ID guide as it is a species at risk. The suspected Peary caribou images could also be provided to the IEAC for herd identification assistance.
Importance	Low

KIA-NIRB-49

Review Comment Number	KIA-NIRB-49
Subject/Topic	Using caribou collar data to define seasonal ranges
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Figures 11, 12 • Appendix A: Detailed Methodology for the Hope Bay Project Programs, 2023 <ul style="list-style-type: none"> ○ Sections 6.1.1.1, 6.1.1.2



Summary	Kernel density analyses for Beverly/Ahiak and Dolphin and Union caribou use published dates (from 2000) and older collar data (from 2004), respectively. Agnico Eagle should consider analyzing recent collar data to define seasonal ranges/periods.
Detailed Review Comment	<p>Sections 6.1.1.1 and 6.1.1.2 of Appendix A (Detailed Methodology for the Hope Bay Project Programs, 2023) describe how kernel density analyses were completed for Beverly/Ahiak and Dolphin and Union caribou, respectively.</p> <p>The calving period was analyzed for Beverly/Ahiak caribou, estimated to be between June 5 and 20 following Gunn et al. (2000). Agnico Eagle adjusted for years with late springs when females may arrive on the calving grounds after June 5: <i>“All movement tracks of individual caribou were examined for each year. A set of locations for an animal trailing northward at the start of the calving period was considered part of its spring migratory movement; these series of locations were removed until the point at which the animal slowed and remained for the duration of the calving period near the body of the herd.”</i> However, it is unclear if a similar movement analysis was applied to the end of the calving period instead of a set date of June 20.</p> <p>The winter range was analyzed for Dolphin and Union caribou (note: there are typos in the captions of Figures 11 and 12 in the main body of the 2023 WMMP Compliance Report, which states ‘calving home range’ instead of ‘winter range’). The winter range (December 8 to April 16), beginning of spring migration (April 17), and end of fall migration (December 7) were determined using collar data from 1999 to 2004. These dates were then applied to caribou collar data from 2015 onward. It is unclear why Agnico Eagle does not examine movement tracks, like they do for Beverly/Ahiak caribou (as described above), to adjust the seasonal ranges as needed.</p> <p>A recent study on Bathurst caribou showed potential changes in barren- ground caribou phenology. Mennell (2021) completed an analysis of Bathurst caribou collar data from 1997-2019 and found that the annual and seasonal ranges contracted in size and moved northward as the population declined. Mennell (2021) also found trends in the timing and duration of annual range occupancy over the study period: the duration of spring migration significantly decreased, with caribou reaching their calving range eight days earlier; and the duration of the post-calving/early summer period significantly increased and ended 13 days later.</p>



	To the reviewer's knowledge, a similar study has not been completed on the Beverly/Ahiak or Dolphin and Union caribou. However, it is conceivable that seasonal ranges of these herds may also be changing, especially in the face of climate change.
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please clarify if movement analyses are used to define the end of the Beverly/Ahiak calving period, in addition to the beginning. • Please consider re-analyzing winter range and spring and fall migration dates for Dolphin and Union caribou (including on an annual basis) instead of applying the dates derived from 2004.
Importance	Low

KIA-NIRB-50

Review Comment Number	KIA-NIRB-50
Subject/Topic	Errors and disorganization of wildlife camera events
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Appendix F: Wildlife Events Recorded by Wildlife Cameras, Doris and Madrid Areas, September 2021 to September 2023 • Appendix L: Wildlife Events Recorded by Wildlife Cameras, Boston Project, September 2021 to September 2023
Summary	Appendix F (wildlife camera events) of the 2023 WMMP Compliance Report is poorly organized and appears to have data entry, transcription, and formatting errors, making it difficult to review. Both Appendix F (Doris- Madrid) and Appendix L (Boston) have issues with the time formatting.
Detailed Review Comment	<p>In addition to the issues described in review comment 'KIA-NIRB-09: Camera monitoring reporting periods', there are other errors and disorganization problems in Appendix F that make it difficult to review this appendix.</p> <p>There appears to be a few displaced Comments as they do not match the Species observed. For example, a caribou event at Camera 24 on 6 July 2022 has the comment "<i>Wolvering [sp] sitting, then rolling, and walking off</i>". This comment likely belongs to the entry below of a wolverine event 9 minutes later at the same camera. A caribou event at Camera 4 on 3 July 2022 has the comment "<i>Bear knocked the camera down</i>"; and another caribou event at Camera 36 on 25 July</p>



	<p>2022 has the comment “Two grizzly bears noted in images captured while camera was knocked down.” It is unclear where these latter two comments belong, as the subsequent entries are from different dates and/or cameras. Is it possible to correct these errors or have the raw data been modified?</p> <p>Furthermore, Appendix F is organized in an illogical manner. It appeared to be sorted by camera number and then date under “Part 1. Camera Data for Caribou, Grizzly Bear, Wolverine, Muskox, and Nest Predators recorded on motion-triggered photos” (the subheading on the first page). After the last row for Camera 59 on page 9, the camera numbering restarts but it is neither in order of camera number nor date, and there is no “Part 2”. In addition, after the second row for Camera 53 on this page, the Camera Type (i.e., Treatment, ZOI, ZOI/Ladder, Control) is no longer entered and the Start Time and End Time formats have all been converted to “1/0/1900”. There is also one row for Camera 26, on page 11, where the Date format converted to “19199”. (Note: the Time formatting is also bungled for the entire Appendix L.)</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please ensure that camera data are entered/transcribed properly, including for date/time formatting and ensuring that information is not accidentally displaced. • Please explain how Appendix F is organized in the 2023 WMMP Compliance Report and ensure that data are organized in a more sensible way during future annual reporting.
Importance	Low

KIA-NIRB-51

Review Comment Number	KIA-NIRB-51
Subject/Topic	Incidental wildlife observations
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Section 3.8.4 • Appendix H: Hope Bay Incidental Wildlife Observations 2023 • Appendix I: Summary of Wildlife Recorded Incidentally by Biologists at the Project, 1996 to 2023 • Appendix J: Summary of the Hope Bay Project Wildlife Sightings Log and Incidental Sightings, 2011 - 2023



	<p>Agnico Eagle, Hope Bay Project, Proponent's Response to Comments Received on the NIRB 2022 Annual Report (September 2023)</p> <ul style="list-style-type: none"> KIA-NIRB-04 <p>Agnico Eagle, Hope Bay, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> Sections 2.2.6, 2.8
Summary	<p>The KIA has additional comments on incidental wildlife observations in 2023, including pilot observations of caribou, the potential need for building maintenance (for wildlife exclusion), and discrepancies in the number of years of incidental wildlife sightings by biologists.</p>
Detailed Review Comment	<p>The KIA has a few comments on the incidental wildlife observations presented in Appendices H, I, and J.</p> <p>First, the KIA appreciates that pilots were more diligent at recording wildlife observations in 2023, as indicated in Appendix H (Hope Bay Incidental Wildlife Observations 2023). There were no caribou observations reported from the air in 2022 (as commented upon by the KIA during the 2022 NIRB Annual Report; KIA-NIRB-04). In 2023, pilots reported one caribou observation in June and nine in September.</p> <p>Second, there was one incidental observation of a hare on 16 July 2023 where the observer noted the animal running <i>and "Disappeared under G wing"</i>. Please clarify if the G wing required screening/skirting to be repaired. Sections 2.2.6 (Mitigation for Attraction) and 2.8 (Infrastructure and Waste Management) of the WMMP Plan indicate that all buildings will be wildlife-proof; <i>"designed and maintained to exclude wildlife including skirting, screens over vents, and other protective measures, as needed."</i> The KIA understands that no den sites were found on or under infrastructure in 2023 and that building skirting and routine inspections for denning potential have been effective (Section 3.8.4). Please continue to complete timely repair of any wildlife access points that are found during routine inspections or incidentally.</p> <p>Third, there seem to be discrepancies between Appendix I (Summary of Wildlife Recorded Incidentally by Biologists at the Project, 1996 to 2023) and the column for 'Incidental Sightings (Biologists/Surveyors 1996-2023)' in Appendix J. For example, Arctic Fox is entered as 15 (number of years recorded) in Appendix I but 13 in Appendix J. Should the data be the same between the two tables? Has Appendix J not been updated for 2023 data?</p>
Recommendation/	<p>The KIA requests the following:</p>



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Request	<ul style="list-style-type: none"> • Please confirm if the incidental hare observation on 16 July 2023 also identified needed repairs for wildlife exclusion at the G wing, and if these repairs have been made. • Please clarify if the values in Appendix I and Appendix J should correspond with respect to incidental wildlife sightings by biologists.
Importance	Low

KIA-NIRB-52

Review Comment Number	KIA-NIRB-52
Subject/Topic	Invasive plant monitoring program
References	<p>ERM, Hope Bay Project, 2023 Wildlife Mitigation and Monitoring Program Compliance Report (April 2024)</p> <ul style="list-style-type: none"> • Table 1 • Section 3.13 • Appendices V, W, X, Y, AD <p>Agnico Eagle, Hope Bay, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> • Section 3.1.14.1
Summary	The KIA appreciates that an invasive plant monitoring program was implemented in 2023. We have a minor suggestion for improvement (expanding the list of target species) and request clarification on surveys completed at Windy Camp and the next monitoring cycle.
Detailed Review Comment	<p>The KIA is pleased to see that an invasive plant monitoring program was implemented in 2023 using rigorous methods (Section 3.13 and Appendices V through Y, AD of the 2023 WMMP Compliance Report) that can contribute to Early Detection and Rapid Response (EDRR) of invasive species. Of note, the KIA appreciates that the rapid roadside surveys slowed down to 3-5 km/hr (Section 3.13.2.2; Appendix Y), compared to other surveys that have driven 30-70 km/hr in Arctic environments (Line et al., 2008; Oldham, 2007; Oldham & Delisle-Oldham, 2017).</p> <p>One suggestion for improvement is to expand the list of invasive and non- native species targeted for monitoring (Appendix V) to include additional species listed in the NatureServe database as Exotic/Not Applicable (SNA) in Nunavut, including:</p>



	Common Name	Scientific Name
	Hybrid Yellowish Sedge	<i>Carex x flavicans</i>
		<i>Carex x nearctica</i>
	Shore Horsetail	<i>Equisetum x litorale</i>
	Intermediate Cotton-grass	<i>Eriophorum x medium</i>
		<i>Eriophorum x medium ssp. x album</i>
	Red Fescue	<i>Festuca rubra ssp. rubra</i>
	Perennial Ryegrass	<i>Lolium perenne</i>
	Vineleaf Colt's-foot	<i>Petasites frigidus var. x vitifolius</i>
	Tikhomirov's Cinquefoil	<i>Potentilla tikhomirovii</i>
	Spitzbergen's Buttercup	<i>Ranunculus x spitzbergensis</i>
	Laurent's Willow	<i>Salix x laurentiana</i>
		<i>x Puccinhippsia vacillans</i>
	<p>The KIA acknowledges that some of these Exotic species are hybrids and may be difficult to distinguish from native species. Nevertheless, adding these species to the target list would put them 'on the radar' for future invasive plant monitoring surveys.</p> <p>In Appendix AD, on both the overview and zoomed-in Madrid maps, the call- out line for the Decommissioned Windy Camp does not point to survey grid locations. It is unclear if this was a cartography decision for legibility. Please confirm whether invasive plant monitoring in 2023 covered the entire Windy Camp area. The presence of invasive plants would inform the need for further reclamation/restoration/revegetation efforts at Windy Camp.</p> <p>Finally, Agnico Eagle states in Table 1 and Section 3.13 that invasive plant monitoring will occur at 5-year intervals (as indicated in the WMMP Plan, Section 3.1.14.1), and that the next monitoring cycle will in 2029. However, five years from 2023 is 2028.</p>	
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please consider including additional exotic vegetation species (i.e., subnational rank SNA in Nunavut in the NatureServe database) on the list of invasive species targeted for monitoring. 	



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	<ul style="list-style-type: none"> • Please confirm if the entire decommissioned Windy Camp area was surveyed for invasive plants, as the maps in Appendix AD are ambiguous. • Please plan to complete the next cycle of invasive plant monitoring in 2028 (rather than 2029), which would comply with the 5-year monitoring interval specified in the WMMP Plan.
Importance	Low

KIA-NIRB-53

Review Comment Number	KIA-NIRB-53
Subject/Topic	Exceedance of PM _{2.5} in January 2023
References	<p>Nunami Stantec Limited, Q1-Q3 2023 Atmospheric Compliance Monitoring Program Report – Doris and Madrid Projects (March 2024)</p> <ul style="list-style-type: none"> • Section 4.3.3.2; Figure 4-7
Summary	Fine particulate matter (PM _{2.5}) measurements exceeded CAAQS in January and August 2023. The latter was attributed to forest fires in the Northwest Territories. The former exceedance was not discussed in the Q1-Q3 2023 Atmospheric Compliance Monitoring Report.
Detailed Review Comment	In Section 4.3.3.2 of the 2023 AQMP Compliance Report, Agnico Eagle states, “As seen in Figure 4-7, measured PM _{2.5} concentrations at the station have been below this [CAAQS] level except for one measurement which was likely influenced by forest fires.” Figure 4-7 appears to show two measurements in August that exceed the CAAQS (still likely due to the NWT forest fires); however, another exceedance occurred in January 2023, which was not discussed. Please provide an explanation for this exceedance, such as Project activities occurring at the time or other confounding factors.
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please explain what may have caused the exceedance of PM_{2.5} in January 2023, as shown in Figure 4-7 of the 2023 AQMP Compliance Report.
Importance	Low



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KIA-NIRB-54

Review Comment Number	KIA-NIRB-54
Subject/Topic	Lack of precipitation data for 2023
References	Nunami Stantec Limited, Q1-Q3 2023 Atmospheric Compliance Monitoring Program Report – Doris and Madrid Projects (March 2024) <ul style="list-style-type: none"> Sections 3.5, 3.5.3
Summary	Nine months of precipitation data were not collected between October 2022 and July 2023 due to equipment malfunction. It is unclear if there are backup precipitation data and how the missing data affected interpretation of atmospheric compliance monitoring results.
Detailed Review Comment	In Section 3.5 of the 2023 AQMP Compliance Report, Agnico Eagle explains that the Geonor T-200B all-weather precipitation gauge began to malfunction on 10 October 2022. After repair attempts by Agnico Eagle technicians were unsuccessful, the unit was replaced on 3 July 2023. In Section 3.5.2, Agnico Eagle states that total precipitation data for January – June 2023 were invalidated as the data recovery rate is less than 75%. The implications for missing nine months of precipitation data (e.g., for interpreting atmospheric compliance monitoring) are not described in this 2023 AQMP Compliance Report. Furthermore, Section 3.5 states that prior to the Geonor gauge, the Doris meteorological station had been recording precipitation data. Are these meteorological station data no longer available to be included in the data analyses for 2023?
Recommendation/Request	The KIA requests the following: <ul style="list-style-type: none"> Please explain how the lack of precipitation data in 2023 affected interpretation of atmospheric compliance monitoring results. Please clarify whether the Doris meteorological station continues to collect precipitation data, and if these data could have been used for 2023 analyses.
Importance	Low



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Socio-Economic Monitoring Report

KIA-NIRB-55

Review Comment Number	KIA-NIRB-55
Subject/Topic	Socio-economic Monitoring Program
References	Page 1-4 to 1-5
Summary	The report notes that one of the objectives of the SEMC is to collect baseline data that is validated by local and traditional knowledge. While the report notes challenges in collecting socio-economic data, the report does not talk about how these barriers can be overcome.
Detailed Review Comment	Reliable baseline data is necessary for accurate measurements of the project's contribution to the socio-economic conditions of the Inuit.
Recommendation/ Request	KitIA asks for more information about how Agnico Eagle collects baseline data and how that data is validated by local and traditional knowledge.
Importance	Moderate

KIA-NIRB-56

Review Comment Number	KIA-NIRB-56
Subject/Topic	Community Involvement Plan
References	Page 1-6
Summary	Agnico Eagle commits to developing a Community Involvement Plan. The plan is about how Agnico Eagle provides information, solicits feedback, and reports on engagement activities and outcomes.
Detailed Review Comment	KitIA's experience over the last year is that Agnico could improve its communication with KitIA staff. Some of the issues include: 1) there is little to no collaboration when planning committee meetings 2) Agnico Eagle is not responsive requests about Inuit employment or training or contract numbers, instead of providing the information, KitIA has to wait for the next Implementation Committee Meeting which are to be held annually during Care and Maintenance. This means that KitIA could be waiting months to get the information.
Recommendation/ Request	KitIA requests further discussions with Agnico Eagle about how communications can be improved.
Importance	High



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KIA-NIRB-57

Review Comment Number	KIA-NIRB-57
Subject/Topic	Inuit Social Values (ISV)
References	Page 2-9, 3-2, 3-3,4-2, 4.4, 4-5, 4-12, 5-3, 5-7, 5-8, 5-10, 5-12, 5-13, 5-15, 5-18, 5-23, 6-7, 6-8, 7-4, 8-3, 8-4, 8-5, 8-8, 8-11, 9-3, 9-4, 9-10, 9-14, 9-16,
Summary	All of Inuit Social Values should be reflected in actions
Detailed Review Comment	KitIA recognizes Agnico's efforts to recognize Inuit Social Values. However, KitIA believes that Agnico's approach misses the mark in some ways. For example, stating that certain actions or programs express one Inuit Social Value misses the point that all of Inuit Social Values should be reflected in that action, not just one.
Recommendation/ Request	KitIA recommends that KitIA be consulted prior to Agnico Eagle concluding that it has reflected ISV in its work. KitIA seeks more information about why they make the conclusions that Agnico actions reflect ISV.
Importance	Low

KIA-NIRB-58

Review Comment Number	KIA-NIRB-59
Subject/Topic	Kitikmeot Qualified Businesses
References	Figure 4.5-1 page 4-6
Summary	Figure 4,5-1 that shows the number of Kitikmeot Qualified Businesses on the y axis and suggests that there are Kitikmeot Qualified businesses that are non-Kitikmeot based
Detailed Review Comment	Non-Kitikmeot based businesses cannot be considered Kitikmeot Qualified Businesses
Recommendation/ Request	KitIA seeks an explanation to why non-Kitikmeot based businesses are included on this table
Importance	Moderate



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KIA-NIRB-60

Review Comment Number	KIA-NIRB-60
Subject/Topic	Inuit and Kitikmeot Employment
References	Page 5-4
Summary	The Report says that information for Kitikmeot and Inuit employees was only available for employees and that 5% of the total workforce was Kitikmeot and 1% were Inuit from outside of the Kitikmeot.
Detailed Review Comment	These numbers are low. KitIA raised concerns about the low numbers of Kitikmeot and Inuit employees in its review of past Annual Reports. KitIA refers Agnico Eagle to many recommendations and concerns raised in their comments from 2023.
Recommendation/ Request	KitIA asks when will numbers be available for contract employees. KitIA asks Agnico Eagle to be deliberate about taking steps before the end of care and maintenance to put them in a position to significantly improve Kitikmeot and Inuit employment post care and maintenance.
Importance	High

KIA-NIRB-61

Review Comment Number	KIA-NIRB-61
Subject/Topic	Kitikmeot Employment
References	Page 5-6
Summary	The report states that the most of Inuit employees come from Cambridge Bay
Detailed Review Comment	What are the reasons behind this statistic? What are the barriers to hiring Inuit from other Kitikmeot communities?
Recommendation/ Request	KitIA asks Agnico Eagle to increase the numbers of Inuit employees from other Kitikmeot communities, without decreasing the numbers employed from Cambridge Bay.
Importance	High



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KIA-NIRB-62

Review Comment Number	KIA-NIRB-62
Subject/Topic	High School Achievement Awards
References	Page 5-10
Summary	During Care and Maintenance in 2022 and 2023, high school achievement awards that recognize traditional knowledge and academic excellence were paused.
Detailed Review Comment	KitIA asks why pause such a worthy initiative. It remains beneficial to increase the interest of students in mining even if the mine is in care and maintenance.
Recommendation/Request	KitIA asks that the high school achievement awards be reinstated during care and maintenance.
Importance	Moderate

KIA-NIRB-63

Review Comment Number	KIA-NIRB-63
Subject/Topic	Inuit Employment - turnover
References	Figure 5.5-1, page 5-12
Summary	The graph reports that there was an increase in turnover of Inuit employees from 2022 (18%) to 2023 (33%) while the number of employees did not increase at the same rate.
Detailed Review Comment	KitIA asks why the increase, and asks that Agnico make efforts to mitigate this
Recommendation/Request	Agnico should create a plan to mitigate the high Inuit turnover rate.
Importance	High



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KIA-NIRB-64

Review Comment Number	KIA-NIRB-64
Subject/Topic	Training
References	Page 5-16
Summary	In 2023, 343 hours of training were delivered to Inuit.
Detailed Review Comment	This number of training hours for Inuit is very low.
Recommendation/ Request	KitIA repeats its request made in 2023 that Agnico Eagle get ahead of the curve on training so that when care and maintenance is over, Agnico Eagle has an improved chance to maximize Inuit employment.
Importance	Moderate

KIA-NIRB-65

Review Comment Number	KIA-NIRB-65
Subject/Topic	Training
References	Page 5-17
Summary	Organic growth training was delivered to Inuit workers in 2022 In 2023 general training, health and safety training and job specific training was delivered to Inuit workers.
Detailed Review Comment	KitIA observes that the areas of training for Inuit workers are basic and not technical.
Recommendation/ Request	KitIA repeats its request made in 2023 that Agnico Eagle increase training in more versatile and transferrable skills KitIA asks what is included in organic growth training.
Importance	Moderate



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KIA-NIRB-66

Review Comment Number	KIA-NIRB-66
Subject/Topic	Training
References	Page 5-24
Summary	The report states that Agnico Eagle hosts community information and a career awareness session at least annually.
Detailed Review Comment	This is inaccurate. Agnico eagle does not host community information and career awareness sessions during care and maintenance.
Recommendation/Request	KitIA asks why these sessions are paused during care and maintenance. Keeping them up may help Agnico Eagle get ahead of the curve on training so that when care and maintenance is over, Agnico Eagle has an improved chance to maximize Inuit employment.
Importance	Moderate

Thank you.

John Roesch, P.Eng.

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