

Environmental Health Program (EHP)
Regulatory Operations and Enforcement Branch (ROEB), Health Canada
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June 23, 2025

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

Sent by email to: info@nirb.ca; and, kmorrison@nirb.ca

Subject: Health Canada's response to the Comment Request for Agnico Eagle Mines Limited's Doris North Mine and Hope Bay Belt Phase 2 Project 2024 Annual Monitoring Report

Dear Keith Morrison,

Thank you for your letter dated May 23, 2025, requesting comments on the Doris North Mine and Hope Bay Belt Phase 2 Project 2024 Annual Monitoring Report provided by Agnico Eagle Mines Limited.

Health Canada (HC) participates in environmental assessments as a federal authority under the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14 (*NuPPAA*). Upon request, HC makes available specialist or expert information or knowledge in its possession to review panels and responsible authorities.

The objective and scope of HC's review was to verify that the potential health impacts of the project are properly identified and to support responsible authorities to prevent, reduce, and mitigate the potential health impacts of project activities.

HC has reviewed the 2024 Annual Monitoring Report with particular consideration to conditions in Project Certificates 003 and 009 that relate to monitoring and mitigation of potential Project-related impacts to air quality and noise. HC's comments are attached.



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Should you have any questions concerning HC's response, please contact Ashley James at ashley.james@hc-sc.gc.ca.

Sincerely,

David Kitchen
Regional Manager, MB/SK/NU Region
Environmental Health Programs
Regulatory Operations & Enforcement Branch
Health Canada

cc: Heather Jones-Otazo, Manager, Environmental Assessment and Contaminated Sites (EACS) Division, Healthy Environments and Consumer Safety Branch (HECSB), Health Canada
Ashley James, Impact Assessment Specialist, EHP, ROEB, Health Canada
Helen Yeh, Environmental Assessment Specialist, EHP, ROEB, Health Canada
Wendy Wilson, Senior Environmental Health Specialist, EACS, HECSB, Health Canada
Julie Anderson, Environmental Assessment Coordinator, EACS, HECSB, Health Canada

Doris North Mine and Hope Bay Belt Phase 2 Project 2024 Annual Monitoring Report

Health Canada Comments

Comment Number:	HC-01
Subject/Topic:	Analysis of fine particulate matter monitoring results
References:	<p><i>2024 Annual Monitoring Report</i>, Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report</p> <ul style="list-style-type: none"> • Section 4.3.2 – PM_{2.5}, PDF pg. 36 • Table 4.9, PDF pg. 39 • Figure 4.7, PDF pg. 40 <p>Doris North Gold Mine Project Certificate No. 003 Amendment 02</p> <ul style="list-style-type: none"> • Term and Condition 30
Comment:	<p>Use of 3-year averaging period for comparison against CAAQS values.</p> <p>The discussion of fine particulate matter (PM_{2.5}) monitoring results states that “[a]n explicit comparison to the CAAQS cannot be made as two-years of valid data are not available... as such comparison to the CAAQS is provided for informational purposes only; not to assess compliance”. Table 4.9 and Figure 4.7 appear to contain 3 years of monitoring results, and it is therefore unclear on why a 3-year averaging period cannot be calculated for PM_{2.5}. HC acknowledges that unforeseen challenges may occur when collecting monitoring data and that it possibly was not feasible to include a 3-year average of the monitoring results for CAAQS comparison in this year’s monitoring period. HC anticipates reviewing these results in the 2025 Annual Monitoring Report.</p>
Conclusion/Request:	<p>HC recommends:</p> <ol style="list-style-type: none"> 1. Including a calculation of the 3-year averaging period for PM_{2.5} for comparison to the CAAQS in future monitoring reports.

Comment Number:	HC-02
Subject/Topic:	Exceedances in dustfall
References:	<i>2024 Annual Monitoring Report</i> , Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report

	<ul style="list-style-type: none"> • Section 4 – Monitoring Program Results and Discussion, PDF pg. 27-33 • Section 4.2.2 – Madrid Site, PDF pg. 31 • Tables 2.1 & 4.6, PDF pg. 16 & 32 <p>Phase 2 Hope Bay Belt Project Certificate 009</p> <ul style="list-style-type: none"> • Term and Condition 01 <p>Doris North Gold Mine Project Certificate No. 003 Amendment 02</p> <ul style="list-style-type: none"> • Term and Condition 30
Comment:	<p>Potential increases in seasonal dustfall trends and engagement with Inuit and Indigenous communities and land users regarding dustfall concerns.</p> <p>Section 4 of the <i>Q1-Q3 2024 Atmospheric Compliance Report</i> discusses the results of sampling programs conducted in accordance with Term and Condition 01 and 30 for the Madrid and Doris sites, including dustfall canister sampling results. Section 4.2.2 discusses, and Table 4.6 demonstrates summer dustfall exceedances at four out of nine Madrid site monitoring locations when compared against the 2017 FEIS maximum predictions of dustfall (Table 2.1).</p> <p>Dustfall exceedances at the M-DF04 station were reasonably attributed to short-term construction activities when compared against values observed in earlier summer months. However, consistently elevated values (compared to other dustfall sampling stations) and exceedances at stations M-DF06, M-DF07 and M-DF08 during the summer months were not discussed given the context of reduced ongoing operations during the current Care and Maintenance mode.</p>
Conclusion/Request:	<p>HC recommends:</p> <ol style="list-style-type: none"> 1. Continued monitoring of dustfall to determine whether trends of consistently high dustfall exist at seasonal sampling locations, and if so, to determine the source of the exceedances. 2. Ongoing engagement with Inuit and Indigenous communities and/or traditional land users regarding the dustfall results in relation to applicable guidelines and address any concerns land users may have.

Comment Number:	HC-03
Subject/Topic:	Updates to Noise Abatement Monitoring Plan
References:	<p><i>2024 Annual Monitoring Report</i></p> <ul style="list-style-type: none"> • Section 7.2 – Noise, PDF pg. 135 • Appendix D.2 – 2024 Wildlife Mitigation and Monitoring Program Compliance Report Part 1, Section 2.5: Noise Monitoring, PDF pg. 35 • Appendix F.1 – Care and Maintenance Plan Version 3, Section 1.3: Temporary Closure, PDF pg. 16 <p>Doris North Gold Mine Project Certificate No. 003 Amendment 02</p> <ul style="list-style-type: none"> • Term and Condition 29 <p>Phase 2 Hope Bay Belt Project Certificate 009 Terms and Conditions</p> <ul style="list-style-type: none"> • Term and Condition 04
Comment:	<p>Consider updating the current Noise Abatement Monitoring Plan to reflect potentially impacted human receptors.</p> <p>The current Noise Abatement Plan includes a component relevant to environmental noise (e.g., wildlife) as well as a component relevant to occupational health and safety (e.g., operator noise exposure, indoor plant noise, etc.). While operational noise may be reduced during the Care and Maintenance period, exploratory site activities (e.g., quarry blasting) which may generate noise are also currently occurring.</p> <p>The presence of human receptors at the Doris Site workers camp who reside on-site while off-duty, as well as the potential presence of traditional land users may warrant additional consideration of possible health impacts related to noise.</p> <p>HC remains available to review any potential modifications to the Noise Abatement Monitoring Plan (as per Term and Condition 04 and 29).</p>
Conclusion/Request:	<p>HC recommends consideration of the following updates to the Noise Abatement Monitoring Plan:</p> <ol style="list-style-type: none"> 1. Include the potential presence of off-duty human receptors and seasonal/traditional land users who

	<p>may experience health impacts due to noise from current maintenance and exploratory activities.</p> <ol style="list-style-type: none"> 2. Provide information on the timing of current maintenance and exploratory activities (e.g., blasting), particularly if they have the potential to impact sleep or result in increased annoyance at human receptor locations. 3. Implement noise complaints communication and resolution plan to notify off-duty workers and/or traditional land users of excessively noisy activities and to address noise-related complaints in a timely manner if received.
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Comment Number:	HC-04
Subject/Topic:	Editorial note: Incorrect guidance citations
References:	<p><i>2024 Annual Monitoring Report</i>, Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report</p> <ul style="list-style-type: none"> • Table 2.1, PDF pg. 16 • Section 4.4 Nitrogen Dioxide, PDF pg. 41 • Table 4.11, PDF pg. 41 • Table 4.13, PDF pg. 42
Comment:	<p>Incorrect citations of outdated CAAQS values.</p> <p>Tables 2.1, 4.11, and 4.13 contain some discrepancies related to the most up-to-date guidelines for comparisons against monitoring results. The current (as of 2025) 1-h NO₂ Canadian Ambient Air Quality Standard (CAAQS) is 79 µg/m³ (42 ppb), not 113 µg/m³ (60 ppb) and the annual NO₂ guidance value is 12 ppb, not 17 ppb. Please refer to the CAAQS Handbook (2025)¹ to ensure the most up-to-date CAAQS values are reflected in future Annual Monitoring Reports as well as the most recent version of the Air Quality Management Plan.</p> <hr/> <p>¹Canadian Council of Ministers of the Environment. 2025. Canadian Ambient Air Quality Standards Handbook. Available online at: https://ccme.ca/en/res/caaqshandbook.pdf</p>
Conclusion/Request:	<p>HC recommends:</p> <ol style="list-style-type: none"> 1. Updating all relevant documents to include the most up-to-date CAAQS values.