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Fax: (867) 982-3311
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Kugluktuk

Bathurst Inlet
Kingaok

Bay Chimo
Umingmaktok

Cambridge Bay
Ikaluktutiak

Gjoa Haven
Okhoktok

Taloyoak

Kugaaruk

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

June 23rd, 2025

Re: Review of AEM's 2024 Annual report for Hope Bay Project Certificate NIRB No. 009.

Dear Kelli Gillard, the KIA has reviewed AEM's 2024Annual 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.

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- 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 is 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 2024 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 2024 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 2024 Hope Bay Project IIBA implementation results was provided in the April 2025 IIBA Manager Report to the KIA Board. This included a comprehensive review of Inuit employment, training and contracting at the Hope Bay Project for 2024. In April 2025, Agnico Eagle Mines (AEM) presented to the KIA board about their 2024 employment, training and contracting numbers.

The Inuit Environmental Advisory Committee (IEAC) had two meetings in 2024, one in July and one in October. 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. In July the IEAC discussed snowbank monitoring, the zone of influence analysis, nest predators and a caribou ID workshop. In October the IEAC discussed different areas for snowmobile crossings, dismantling the Old Windy Lake camp, and repairing old cabins around the project area, and IEAC membership.

The IEAC toured site facilities including Roberts Bay, Doris Mine, the Tailings Impoundment Area, Windy Lake and Madrid North in July 2024.

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KIA has reviewed AEM's 2024 Socio-Economic Monitoring Report, KIA has noted the overall increase in Inuit employment and contracting in 2024. However, it was observed that there has been a decrease in Inuit training at the project in 2024. KIA will continue to monitor socio-economic activities while the project is in care and maintenance and discuss any concerns at the IIBA Implementation Committee.

Internal Report on September Hope Bay Inspection – August 13 to 16, 2024

Summary

The inspection of the Hope Bay mine site and facilities was conducted from August 13th to 16th as per the established inspection schedule. Guy Dufour of Agnico Eagle Mines Ltd. (AEM) accompanied John Roesch and Jennifer Amagoalik on the inspection. Sixty-three site components out of 117 components were inspected in accordance with the established schedule.

Overall, the mine site is being maintained in good condition while in care and maintenance. Robert's Bay, the Airstrip and Access Road, Doris North, Waste Management Area, 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 been spilled from drill casing. Two are right along Windy Road and seven others are at drilling locations around Patch Lake. These spills were reported to the NT-NU 24-hour spill report line on July 25, 2023. Susan Bishop of ABR Environmental research & Services is scheduled to come this summer to inspect these brine spills for AEM and advise them.
The jetty has been lowered to accommodate the offloading of cargo by the barge by other companies.

The Robert's Bay discharge pipe is in good condition and the diffuser that was recently installed is currently in good condition and is being weighed down by concrete collars. Ocean water is recirculated and discharged into the water to prevent the discharge pipe from freezing in the winter. The airstrip is in good condition but does require pumping of pond water on the west side of the airstrip. The crushing and milling plant is shut down and will be gutted and rebuilt. Clean-up around the area is required.

The North Dam is in good condition with no cracking at the crest or water leakage at the toe. Thermosyphon's are now an active system to keep the core frozen. South Dam is in good condition, and future plans include building up the current road in elevation and to create a berm going along the south-west hill to contain tailings.

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

Complete revegetation has occurred in the vegetation dieback zone 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 2024 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 2024 Atmospheric Compliance Monitoring Program Report-Doris and Madrid Project.
    - Appendix D-2. 2024 Wildlife Mitigation and Monitoring Program Compliance Report.
    - Appendix D-3. 2024 Socio-economic Monitoring Program Report.
    - Appendix D-5. 2024 Aquatic Effects Monitoring Program Report.
- Appendix E. Hope Bay 2024 Effluent Monitoring Reports.
- Appendix F. Updated Monitoring and Management Plan.
    - Appendix F.1: Care and Maintenance Plan.
    - Appendix F.2: OPPP/OPEP.
    - Appendix F.3: Spill Contingency Plan.
    - Appendix F.4: Water Management Plan.
    - Appendix F.5: Wildlife Mitigation and Monitoring Plan.

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.

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

Hope Bay 2024 Annual Report to NIRB

KIA-NIRB-01

Review Comment Number	KIA-NIRB-01
Subject/Topic	Sampling locations
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • 2024 Annual Report Appendix D.1: Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 3.2.1, and 3.2.2, Page 7-9.
Summary	In contrast to reasons provided in Table 3.1 and Table 3.2, there were some cases where the sampling locations appeared as though they may not have provided a reliable indication of dustfall levels in the study area.
Detailed Review Comment	• DFA1: On page 7, Table 3.1 states that this site (DFA1) was selected because "This location has historical data and represents dustfall from the general site area, is located downwind of crushing activities, and close to the camp and mill site." Although the site lies east of these facilities, it is 400 – 900 m away. It is unclear if a station at this distance from the operational units can properly indicate the dustfall status of the general site area. While it is recognized that there is a value in retaining DFA1 due to its history of use and historical data to compare against overtime, there may be some utility in adding additional stations to ensure that DFA1 is working as intended to characterize the general site characteristics. • CDF4: Based on Fig. 3.1 (page 8), although this station (CDF4) is positioned east of Quarry 2, it is likely to capture dustfall only from the quarry's southern end, missing dustfalls originated from more central and northern areas. • At the Madrid site (Page 9, Table 3.2), 44 % of the dustfall stations (M-DF06 to M-DF09) are clustered around a single point along the access road, rather than being distributed near other potential dust sources.
Recommendation/ Request	The KIA requests the following:

P.O. Box 360
Kugluktuk, NU X0B 0B0
Telephone: (867) 982-3310
Fax: (867) 982-3311
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	• Please clarify why stations closer to various sources (e.g. mill or quarry) were not selected or added for dustfall measurements. • For CDF4, shifting the station 150–200 m north would make it a better indicator of dustfall originating from Quarry 2 (based on the annual windrose chart provided in the document). • Please clarify why a specific location on the road was prioritized over other pollution sources or other sections of the road (44% of stations on Madrid sites belong to this point).
Importance	Moderate-High

KIA-NIRB-02

Review Comment Number	KIA-NIRB-02
Subject/Topic	Incorporating air dispersion modeling results in the selection of sampling and monitoring locations.
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Section 3.3.2, Page 13
Summary	It is unclear why the results of air dispersion modeling are not being used to select sampling and monitoring sites.
Detailed Review Comment	On Page 13, for TSP and $PM_{2.5}$ sampling location it is mentioned that: *"Sampling is conducted at monitoring location DFA1 in the Doris site. This location is free from obstructions and nearby pollutant sources that may cause interference in suspended particulate monitoring."* Being located near the source alone does not ensure that the highest particulate concentrations will be captured. The same concern applies to the NO_2 sampling location.
Recommendation/ Request	The KIA requests the following: • Please clarify why the results of air dispersion modeling were not used to determine the placement of the monitoring station to characterize the site. • Please provide a map showing selected monitoring/sampling locations vs. areas with the highest predicted concentration of pollutants based on air dispersion modeling study.
Importance	Moderate-High

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Kugluktuk, NU X0B 0B0
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KIA-NIRB-03

Review Comment Number	KIA-NIRB-03
Subject/Topic	Updating maps showing sampling/monitoring stations
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 3.2.1 and 3.2.2, Pages 8 and 10.
Summary	In their current form, the two maps showing sampling and monitoring station locations are hard to interpret.
Detailed Review Comment	On pages 8 and 10, as the operational units are not delineated on the maps (Fig 3.1 and Fig 3.2), it is hard to interpret the sampling-site locations and understand how these sites are positioned relative to different operational units.
Recommendation/ Request	The KIA requests the following: • Please add the operational-unit boundaries to these maps (Fig 3.1 and Fig 3.2).
Importance	Moderate-High

KIA-NIRB-04

Review Comment Number	KIA-NIRB-04
Subject/Topic	Expected vs. measured dustfall concentration at TIA-DF3.
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 3.2.1 and 4.2.1, Pages 7 and 19.
Summary	A significant discrepancy exists between the expected/predicted versus measured concentrations at TIA-DF3.
Detailed Review Comment	In Table 3.1 (page 7), TIA-DF3 is described as being located about 3 km downwind of the TIA tailings beach, far enough that only minimal project-generated dustfall is predicted. Yet its measured concentrations for July and August (Page 19, Table 4-5) are the highest of all the TIA stations. This may indicate issues with existing predictions, or unexpected occurrences happening on site causing

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Kugluktuk, NU X0B 0B0
Telephone: (867) 982-3310
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	more dustfall in this area than anticipated through original examination of project construction and operations.
Recommendation/ Request	Please discuss why dustfall at TIA-DF3 was highest, contrary to the prior expectation that it would be minimal.
Importance	Moderate-High

KIA-NIRB-05

Review Comment Number	KIA-NIRB-05
Subject/Topic	Assigning more stations to the road than to other sources.
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Section 4.4.2, Page 20.
Summary	At the Madrid site, 44% of the stations are positioned at one road location to monitor dustfall from that source.
Detailed Review Comment	On Page 20 the text states: "The measured monthly dustfall levels at locations M-DF06, M-DF07, M-DF08 and M-DF09 are plotted versus distance from the Doris-Madrid All Weather Road (AWR) in Figure 4.2. These monitoring locations were chosen to study the variation in dustfall levels with distance from the roadway. M-DF06 is located 50 m from the road in the predominantly upwind direction, while the other three stations are located 50 m, 100 m, and 200 m downwind. Dustfall levels were relatively consistent from May to August." We appreciate the distance- based monitoring array design; however, it is unclear why 44% of all stations at the Madrid site are assigned to this specific road cross-section rather than spreading these arrays out from various other sections of the road or dust-generating areas.
Recommendation/ Request	The KIA requests the following: • Please clarify why this analysis focuses only on the road. Are there other, potentially more significant, dust sources that should be assessed in the same way or is Agnico Eagle confident based on existing data that this is the most significant source of dust.
Importance	Moderate-High

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KIA-NIRB-06

Review Comment Number	KIA-NIRB-06
Subject/Topic	Sampling methods
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Section 3.2.3.1, Page 11.
Summary	It is unclear how two canisters were combined.
Detailed Review Comment	On Page 11, for summer dustfall sampling it is stated that: "At the laboratory, samples are analyzed for total particulates, anions, cations, and total metals. The data are standardized to units of (mg/100-cm2/30-days or kg/ha/year). For canister samples, this standardization is based on canister opening dimensions and the duration of exposure. Both containers were combined for each station and sampling period at the laboratory. The combined samples were then analyzed for particulates (total, soluble, and insoluble), anions (sulphate, nitrate, chloride, and ammonia) and total metals." This description is unclear. It appears that two canisters are installed at each location and then combined before analysis, yet the results are still expressed per 100 cm^2.
Recommendation/ Request	The KIA requests the following: • Please clarify why the two canisters were merged rather than analyzed separately (as replicates)? Do the reported mg / 100 cm^2 values represent the average of the two canisters or the sum of their combined mass?
Importance	High

KIA-NIRB-07

Review Comment Number	KIA-NIRB-07
Subject/Topic	Handling measurement errors
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Section 3.3.3, Page 13.

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Kugluktuk, NU X0B 0B0
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Fax: (867) 982-3311
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Summary	It is unclear how outliers and measurement errors were handled.
Detailed Review Comment	On page 13 it is mentioned that "Data collected from the continuous monitors were screened for any suspicious data including outliers, instrumentation drift and missing data." However, no more details are provided on how these potential outliers/errors are identified or handled.
Recommendation/ Request	The KIA requests the following: • Please specify the statistical or operational thresholds that were used to classify a reading as an outlier. • Please specify the methods and acceptance criteria applied to detect and correct for instrument drift.
Importance	High

KIA-NIRB-08

Review Comment Number	KIA-NIRB-08
Subject/Topic	Linking high TSP concentration with wildfires
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 4.3.1 and 4.3.2, Page 24-25.
Summary	Attributing the one-day exceedance solely to distant wildfires, without supporting data from adjacent days or extra analyses, does not appear sufficiently justified.
Detailed Review Comment	1- Page 24 states: *"The Doris meteorological tower recorded wind directions on August 9, 2024, initially blowing from south-easterly directions in the morning, but then shifting through the south to blow from south-westerly directions by 9 AM. On August 9, 2024, there were dozens of forest fires burning in the Northwest Territories to the southwest and west of the Sites, as shown in Figure 4.3. In this figure, each red dot indicates the location of an uncontrolled forest fire, with the largest dots representing forest fires greater than 1,000 hectares in size. The measured elevated TSP concentration is likely attributable to long-range transport of forest fire smoke by the south-westerly winds that occurred in the afternoon of August 9th."* This explanation is unconvincing for multiple reasons: • Single-day effect: If wildfire smoke were the sole cause, elevated concentrations would likely persist for more than

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	one day during the sampling period, especially given that the fires probably were ongoing. • Lack of comparison: In Figure 4.3 (page 24), only fire status on August 9th is shown. However, the distribution of wildfire on other days, such as August 8th and 10th are not mapped. • Distance: The nearest mapped fires are roughly 500 km from the mine site. While long-range transport is possible, attributing an exceedance entirely to sources at that distance requires stronger evidence. 2- The same concern for page 25*: "The 98th percentile of the measured 24-hour average PM2.5 concentrations is greater than the maximum predicted 98th percentile PM2.5 concentration in the 2017 FEIS of 12.1 µg/m3 but is within the expected range of variability for dispersion models and includes some measurements likely influenced by forest fires."*
Recommendation/ Request	The KIA requests the following: • Please conduct a more detailed analysis before attributing high pollutant concentrations to fires located approximately 500 km from the site. • Please define the "expected range of variability" for the dispersion model and demonstrate that the observed exceedance falls within that range. • Please provide wind direction and fire data for the day before and the day after August 9th.
Importance	High

KIA-NIRB-09

Review Comment Number	KIA-NIRB-09
Subject/Topic	Dustfall readings for May and June
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Section 4.2.1, Page 19.
Summary	When concentrations for May and June cannot be separated, reporting the same values for both can cause confusion.
Detailed Review Comment	Page 19- Dustfall Sampling: "Dustfall jars were installed at all stations on 10 April 2024, but they could not be retrieved until 10 July 2024; therefore, the reported dustfall concentrations for May and June are

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	the same." Reporting the same values for May and June is not the best solution and can cause confusion to reader. Additionally, it is not clear how these reported numbers are calculated.
Recommendation/ Request	The KIA requests the following: • Please clarify whether the May and June values were calculated by dividing the total three-month accumulation by three? • If no independent measurement was taken for May and June, it would be clearer either to mark May and June as N/A or to merge the May-June rows, rather than repeating the values and potentially misleading readers.
Importance	High

KIA-NIRB-10

Review Comment Number	KIA-NIRB-10
Subject/Topic	Contributing detection limits into the analysis.
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Section 4.2.1, Page 19.
Summary	Reported concentrations for the same pollutant vary when values fall below the detection limit.
Detailed Review Comment	On page 19 the text states, "Measurement was below the laboratory minimum detection limit. A value of ½ the detection limit was used in the assessment." This is unclear. If half the detection limit were applied uniformly, every station and month should show the same substituted value, yet the table lists different numbers.
Recommendation/ Request	The KIA requests the following: • Please clarify how these below-detection-limit results were calculated for each station and month.
Importance	High

KIA-NIRB-11

Review Comment Number	KIA-NIRB-11
Subject/Topic	Formatting issue

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References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 4.2.1 and 4.1.2, Pages 16-17.
Summary	There are inconsistencies in precision when reporting measured concentrations across different sites.
Detailed Review Comment	In Tables 4.2 and 4.4, the numerical precision differs between the two tables (i.e., they show different numbers of decimal places).
Recommendation/ Request	The KIA requests the following: • Please maintain consistent precision (significant digits) when reporting results for different sites or explain why different levels of precision were used.
Importance	Low

KIA-NIRB-12

Review Comment Number	KIA-NIRB-12
Subject/Topic	Monthly wind-rose charts
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 4.5, Page 30.
Summary	No monthly wind-rose charts are provided, however, the temporal scale for the analysis is monthly.
Detailed Review Comment	The windrose chart on page 33 shows annual wind data; however, the analyses are primarily presented monthly, which makes it difficult to relate the climate information to the reported numbers.
Recommendation/ Request	The KIA requests the following: • Please provide monthly wind-rose charts. Because the analyses are carried out on a monthly temporal scale, the results should be reviewed with wind-roses prepared at the same scale.
Importance	High

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Kugluktuk, NU X0B 0B0
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Fax: (867) 982-3311
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KIA-NIRB-13

Review Comment Number	KIA-NIRB-13
Subject/Topic	Area with the highest concentration
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 5, Page 35.
Summary	Some claims about the area predicted to have the highest concentration of pollutants seem contradictory.
Detailed Review Comment	On page 35, it is stated that, "The estimated monthly dustfall rates at the monitoring stations are less than the maximum predicted dustfall level of 53 mg/100-cm2/30-days (250 m from the TIA) in the 2016 Amendment modelling." In addition, Table 3.1 notes for TIA-DF2 that "This station is located approximately 1.65 km downwind (east) of the TIA tailings beach. This location is approximately 300 m west (upwind) of the location predicted to have a maximum annual TIA-generated dustfall level of 23 mg/100-cm2/year (1.9 mg/100-cm2/30-days) in the 2016 Amendment." These two sentences seem contradictory and based on the data provided in the report; it is impossible to evaluate their accuracy.
Recommendation/ Request	The KIA requests the following: • Please double-check the text and clarify which area is expected to have the highest dustfall concentration.
Importance	Moderate

KIA-NIRB-14

Review Comment Number	KIA-NIRB-14
Subject/Topic	High dustfall level at M-DF04
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Q1-Q3 2024 Atmospheric Compliance Monitoring Program Report: Hope Bay Mine (Doris and Madrid Sites), Sections 5, Page 35.
Summary	The elevated dustfall at M-DF04 is attributed to nearby construction activity; however, this claim requires more in-depth analysis.

P.O. Box 360
Kugluktuk, NU X0B 0B0
Telephone: (867) 982-3310
Fax: (867) 982-3311
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Detailed Review Comment	On page 35 it is mentioned: "The elevated dustfall level is likely due to construction activities and material hauling at the Exploration Track and Naartok Pad, respectively, during August 2024. These activities were proximate to the M-DF04 monitoring station and therefore the measurement is not expected to be reflective of dustfall levels in the overall Madrid area." Using the data provided in the report, it is not possible to evaluate the robustness of this claim.
Recommendation/ Request	The KIA requests the following: • Monthly wind rose charts should be provided. • At a minimum, analyze the wind-rose for that specific period and map the construction-activity locations relative to the sampling site to confirm that they support this above-mentioned claim.
Importance	High

KIA-NIRB-15

Review Comment Number	KIA-NIRB-15
Subject/Topic	Edits and changes to Table 1, Summary of the 2024 Wildlife Mitigation and Monitoring Plan Compliance Results
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Hope Bay Mine 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025, Reference 0738548-03), Table 1, pages 5-8.
Summary	Some additional clarity and information could be added to Tabel 1 to make the summary table more immediately understandable.
Detailed Review Comment	There are several opportunities to improve the wording of this table to add more information and accuracy without adding much additional length. The following items could benefit from the suggested edits: • In the row labelled road traffic monitoring, in the Results column, it is stated that daily average transits between Doris and Madrid exceeded Madrid Boston FEIS predictions in June and August. For this statement, it would help to include actual vs predicted number in brackets and state the % overage. • Within the helicopter and fixed wing row, bullet 2 of the second last column states: "to prevent impacts to wildlife, helicopters maintained a 300 m vertical and 600 m horizontal separation from caribou and muskox". Are these distances correct? In other provinces, distances such as 500 m vertical

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Kugluktuk, NU X0B 0B0
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	and 1000-2000 m horizontal are used. In the Yukon, 300 m vertical is used in general, but 600 m vertical avoidance is used during sensitive times of the year. Please double check that the distances are correct. Regardless, these distances are fairly low for fixed wing planes. • In the noise modelling row, second last column, bullet 1 states that "The Madrid-Boston FEIS predicted that 96 Lpeak dBZ will not exceed at 2, 800 m from the location of the blast. The results could not be used to confirm that the overpressure value of 96 Lpeak will not exceed at 2,900 from the location of the blast." This last sentence is vague. Please tell us what the results showed rather than what the results could not be used to show. The main question is: were exceedances measured, and in how many of the 32 instances (what proportion) were predictions exceeded? This could be summarized in a more direct sentence. • Within the construction management row, it is noted that nests found were outside of the vegetation clearing area. Please also note if the nest plus its non-disturbance buffer fall outside of the vegetation clearing zone, as both would be required to not have clearing impacted. • Within Table 1 in general, the word "recent" is used in multiple instances. Please replace subjective terms like recent with date ranges. • Within the row labelled Wildlife Camera Monitoring – Grizzly Bear, results are provided stating that 40% of total events were observed in both treatment and ZOI zones, with the remaining 20% occurring in the control zone. As 40 + 20 does not add up to 100%, I think you meant to write that 40% of the total events were observed in each of treatment and ZOI zones, as the word both could imply combined.
Recommendation/ Request	The KIA requests the following: • Please update the wording within the summary Table 1, as noted within each of the bullets in the detailed comments section, to improve accuracy, transparency, and clarity.
Importance	Low- Moderate

KIA-NIRB-16

Review Comment Number	KIA-NIRB-16
Subject/Topic	Edits and changes to Table 1, Summary of the 2024 Wildlife Mitigation and Monitoring Plan Compliance Results

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Kugluktuk, NU X0B 0B0
Telephone: (867) 982-3310
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References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Hope Bay Mine 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025, Reference 0738548-03), Table 1, pages 5 to 8 and Section 2.2.3, page 2-7, 2-8.
Summary	Do not agree with conclusions about compliance with traffic level not triggering additional evaluation of wildlife protection measures.
Detailed Review Comment	There are several instances where traffic level exceedances above FEIS predictions are noted. • In the summary Table 1, page 6, within the row labelled road traffic monitoring, in the column labelled "Comparison to Terms and Conditions, Predictions, and Program Objectives" a conclusion is made that *"Traffic levels exceeded daily average predictions between Roberts Bay and Doris.* ***However, these did not occur in two consecutive months, and as such, no additional evaluation of wildlife protection measures is required****, …".* Within the body of the report, it is noted that the traffic monitoring program failed in September due to SD data card collection issues. Therefore, one cannot conclude from a lack of data that there were not two consecutive months when daily average traffic levels exceeded predictions. The wording of this conclusion should be changed to match what occurred and to note that it cannot be determined if this occurred in two consecutive months. • In Section 2.2, page 2-8, at the end of the section, the report *states "Final Hearing Commitment 52 establishes the need to compare current traffic levels to predictions in the Madrid-Boston FEIS and to enhance wildlife protection measures if levels are exceeded in two consecutive monitoring periods. In August 2024, the average daily transit was exceeded by more than 25% from Roberts Bay to Doris. It was not exceeded in July 2024 and due to the timing of the collection of the camera cards, it is unknown if this number was exceeded during September 2024."* Based on these results, AEM concludes (e.g., in summary table) that the traffic level exceedances will not trigger additional investigations of wildlife protection measures because the traffic levels did not exceed the daily average predictions for 2 consecutive months (which would require an evaluation of additional wildlife protection measures).

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	Based on the lack of data collected in September due to an issue with camera card data collection, AEM cannot conclude that they did not exceed predicted traffic levels in the FEIS for two consecutive months. They can only conclude that they exceeded the predicted levels in two non-consecutive months and had no ability to evaluate if they exceeded predicted levels in two consecutive months from August through September due to a data collection failure in September. As the onus for proof of compliance is on AEG, the lack of data should not be used to conclude compliance. Under the precautionary principle, September should be interpreted as a potential second consecutive month where traffic predictions were exceeded, and steps should be taken to examine additional wildlife protection measures for this new level of traffic.
Recommendation/ Request	The KIA requests the following: • Please assume that two consecutive months of traffic level predictions occurred rather than using data collection failures as a reason to conclude compliance. • Take the next steps required and explore additional wildlife protection measures for areas exceeding traffic predictions.
Importance	High

KIA-NIRB-17

Review Comment Number	KIA-NIRB-17
Subject/Topic	Grizzly bear attraction to site
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Hope Bay Mine 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025, Reference 0738548-03), Table 1, page 6
Summary	Attraction to the mine was predicted as low in the FEIS for grizzly bear and wolverine due to smells associated with the camp. There were 4 grizzly bear interactions in 2024 with the mine, which is interpreted as being in line with the FEIS predictions regarding attraction to the mine.
Detailed Review Comment	There were 4 instances of grizzly bears entering the mine area, including the core shack. Given what is known about the size of the local grizzly bear population, what number of bear interactions with the mine within a one- year period would elevate the interaction from low to moderate or high? Likewise, what level of interaction between

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	grizzly bears and mine would be interpreted as avoidance? More broadly, how are grizzly bear interactions being interpreted relative to the overall context of grizzly bears in the area?
Recommendation/ Request	The KIA requests the following: • Please provide a brief explanation of how the numbers of grizzly bear interactions with the mine are to be interpreted against FEIS predictions, and why those numbers were selected.
Importance	Moderate

KIA-NIRB-18

Review Comment Number	KIA-NIRB-18
Subject/Topic	Camera wildlife results do not appear to be corrected by active camera days or camera effort, making dating presented in many tables difficult to interpret.
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Hope Bay Mine 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025, Reference 0738548-03), Caribou Section 3.4, Tables 3.3-2, 3.3-3, 3.4-1; Muskox Section 3.5, Table 3.5-1; Grizzly Bear Section 3.6, Table 3.6-1; Wolverine Section 3.7, Table 3.7-1.
Summary	Camera data for caribou, muskox, grizzly bear and wolverine are all summarized as number of events, with camera effort in a separate column, and separately by month. Each camera should have had results corrected by camera effort, and corrected data should have been summarized to render any numbers comparable between months and zones (treatment, ZOI, control). As presented, these tables cannot be interpreted fairly.
Detailed Review Comment	Data are broken into treatment, ZOI and control zones. However, these data cannot be compared as the camera data (number of events) have not been corrected by camera effort per camera and then summarized in a manner that can then be compared. This is not a time-consuming exercise, nor really an analytical one, it is simply converting the units of analyses into units that can be compared or averaged within each zone. The appendices that are references and summarize data have the same issue of not integrating camera events and camera effort. As presented, these data do not appear useful or comparable. One additional column could have been added to each

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	table that summarized adjusted number of events to render results comparable. Because that was not done, there are 7+ tables that are not useful and that would require the reader to calculate out all the adjustments per camera (from the appendices, which also do not contain adjusted data), grouping cameras by zone (treatment, control and ZOI), and comparing average corrected numbers across zones for each month. These data could be summarized for the reader to enable review.
Recommendation/ Request	The KIA requests the following: • Please correct the number of wildlife events per camera by effort for each month. • Please include corrected numbers in appendices, the main tables referenced above, and comparisons among months and zones (control, treatment, ZOI).
Importance	High

KIA-NIRB-19

Review Comment Number	KIA-NIRB-19
Subject/Topic	Spelling errors in appendices, especially in comments sections
References	Nunavut Impact Review Board 2023-2024 Monitoring Report, Doris North and Phase 2 Hope Bay Belt Projects, Project Certificate Nos. 003 & 009, Agnico Eagle Mines Ltd., February 2025. • Hope Bay Mine 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025, Reference 0738548-03).
Summary	Spelling errors were detected that could eventually cause analytical issues.
Detailed Review Comment	• Multiple spelling errors were noted in appendices, particularly in comments sections (e.g., Muscox versus Muskox). In some cases, species were spelled differently within and across appendices and tables. In some cases, a 'sp.' is included after a generic name of an animal that is not identified to species level. In other cases, 'spp.' is used, and yet in others neither sp., spp., sp, or spp is included after the generic name. If R programming is used in the future to collate findings and run statistics, it will be important that spelling does not preclude a line item from being included in an analysis or table gathered using automation. • In addition, 4 letter acronyms for bird species are sometimes used exclusively in comments sections of avian appendices

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	(e.g., Appendix I) – both English and Latin names should be included for readers unfamiliar with the 4-letter avian coding.
Recommendation/ Request	The KIA requests the following: • Please do a thorough standardization and spelling check on all tables and appendices to ensure species are consistently spelled the same. Having different spelling and conventions used will eventually cause analytical binning errors when statistics are conducted using programs like CRAN R. • Please include English names (and Latin names in brackets) for avian species that are only depicted as 4 letter codes in tables and appendices.
Importance	Moderate

KIA-NIRB-20

Review Comment Number	KIA-NIRB-20
Subject/Topic	Noise abatement - blasting
References	Section 5.1 Doris North Project Certificate No. 003 – Revised Term and Condition No. 29; New Term and Condition No. 4; New Term and Condition No. 14 Section 7.2 Noise Appendix D-2 Appendix D-5
Summary	The Proponent is required to develop and implement a noise abatement plan to protect people and wildlife from mine activity noise, including blasting. The proponent has identified sensitive fish Valued Ecosystem Components including arctic char, lake trout, lake whitefish, and ninespine stickleback and stated the noise abatement plan will consider potential blasting time restrictions with Fisheries and Oceans Canada's (DFO) Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters (Wright and Hopky 1998) as modified by DFO for use in the North. The new term and condition No.4 also states that measures to protect people, fish, and wildlife from mine activity noise and vibration including blasting, drilling, equipment, vehicles, and aircraft. It also states that monitoring of noise at least once during each phase of the Project and following quarry blasts to demonstrate that noise levels remain within predicted levels and below applicable guideline and standards.
Detailed Review Comment	Agnico states they do not maintain a standalone Noise Abatement Plan, but for the protection of wildlife, they implement noise management under a wildlife mitigation and monitoring program.

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	The 2024 Wildlife Mitigation and Monitoring Program Compliance Report (Appendix D-3). This report contains noise mitigation and monitoring for blasting only for caribou. No setbacks are discussed regarding fish habitat. In addition, Agnico states that there were 32 blasting and monitored in 2024. A summary map of where the blasting and proximity to nearby water should be reported.
Recommendation/ Request	Include a summary map where the blasting occurred and distances to nearby water in the Wildlife Mitigation and Monitoring Plan (WMMP), along with proposed noise abatement measures for fish.
Importance	Moderate

KIA-NIRB-21

Review Comment Number	KIA-NIRB-21
Subject/Topic	Fish habitat (water level)
References	2024 Aquatic Effects Monitoring Program – Annual Report Appendix D-5 Executive summary Table 1 Section 2.1 Section 3.1 Table 4-1.
Summary	Data of water levels for Windy Lake, Glenn Lake, Patch Lake, Imniagut Lake, P.O. Lake, Ogama Lake, Little Roberts Lake (i.e., seven of eight exposure lakes) during ice-covered season in 2024 were not obtained due to equipment malfunction, logistical challenges, and safety concerns. In addition, Table 1 and Table 4-1. states that there is no effect with the footnote describing that only Doris Lake was assessed for Project-related effects. Table 1 should be updated to differentiate the series of lakes that are assessed for project-effects and that are not assessed as data was not collected.
Detailed Review Comment	Provide estimation of water level for Windy, Patch, Imniagut, P.O., Ogama, Little Roberts and assessment of project-effects similar to how Doris Lake was assessed.
Recommendation/ Request	Provide a detailed rationale for the equipment malfunctions, logistical challenges, and safety concerns. Provide estimation of water level for Windy, Patch, Imniagut, P.O., Ogama, Little Roberts and assessment of project-effects similar to how Doris Lake was assessed.

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	Provide a back-up plan in the future event of equipment failure and/or logistic challenges of data collection of key variables.
Importance	Moderate

KIA-NIRB-22

Review Comment Number	KIA-NIRB-22
Subject/Topic	Fish and Fish Habitat
References	2024 Aquatic Effects Monitoring Program – Annual Report Appendix D-5 Section 3 Table 3.1-1, Table 3.3-1 to 3.3-26 Table 3.4-1
Summary	Proponents report the findings of significant change.
Detailed Review Comment	For summary tables, it would be important to report the directions and relative changes for all the evaluated variables for fish and fish habitat in addition to graphical analysis and plots.
Recommendation/ Request	Provide a summary of all evaluated variables with direction and relative proportional changes from the comparisons
Importance	Low

KIA-NIRB-23

Review Comment Number	KIA-NIRB-23
Subject/Topic	Chlorophyll a fluctuations
References	Appendix D.5 - 2024 Aquatic Effects Monitoring Program – Annual Report p. 118, Section 3.4.1 Biomass
Summary	There is no explanation of substantial fluctuations in chlorophyll a.
Detailed Review Comment	Section 3.4.1 addresses fluctuations in chlorophyll a relative to the reference lake and states that mean phytoplankton biomass decreased from 2011 – 2014 relative to 2009 and 2010 and chlorophyll a concentrations increased between 2014 and 2016. The highest level recorded was in 2022 and has decreased since then. A low action level response was not triggered by these results, but no explanation is provided for the substantial fluctuations in relation to the reference lake, which remained nearly constant.

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Recommendation/ Request	Provide an explanation or hypothesis regarding the substantial fluctuations in chlorophyll a in Doris Lake, in particular relative to the absence of any in the reference lake.
Importance	Low

KIA-NIRB-24

Review Comment Number	KIA-NIRB-24
Subject/Topic	Lake level elevation
References	Appendix D.5 - 2024 Aquatic Effects Monitoring Program – Annual Report p. 120, Section 4 Summary of Evaluation of Effects
Summary	The effects could not be assessed, yet no effect was concluded for all exposure lakes.
Detailed Review Comment	The report states several times that due to equipment malfunction, lake level elevations could not be obtained in any exposure lakes except for Doris Lake. Yet Table 4-1, Summary of Evaluation of Effects concludes 'No Effects' for these lakes in spite of the footnote that states project-related effects could not be assessed.
Recommendation/ Request	Remove 'No Effect' from Column 3 and provide a suitable replacement that indicates no conclusion.
Importance	Low

KIA-NIRB-25

Review Comment Number	KIA-NIRB-25
Subject/Topic	Infrastructure and maintenance
References	Appendix F1 – Care and Maintenance Plan – s.2.61 Roads and Airstrip
Summary	Airstrip extension details are missing.
Detailed Review Comment	The planned airstrip extension is mentioned but lacks specific details on how environmental impacts (e.g. erosion control) will be managed during construction.
Recommendation/ Request	Unless already described in another document, erosion control measures should be described for ongoing construction activities occurring on site.
Importance	Moderate

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KIA-NIRB-26

Review Comment Number	KIA-NIRB-26
Subject/Topic	Water quality monitoring
References	Appendix F2 – Oil Pollution Prevention Plan and Oil Pollution Emergency Plan
Summary	Details on water quality monitoring involving spill incidents are lacking
Detailed Review Comment	The document lacks specific protocols for water quality monitoring during and after spill incidents. The document does discuss the environmental department assessing the site for toxicity of the spill, water, and shorelines during the spill. However once approval from the Canadian Coast Guard is received there is no mention of follow up sampling to assess any residual contaminants in the impacted areas.
Recommendation/ Request	Unless already described in another document, adding procedures for sampling and testing water for contaminants (e.g., hydrocarbons, heavy metals) post spill would enhance the response plan.
Importance	Moderate

KIA-NIRB-27

Review Comment Number	KIA-NIRB-27
Subject/Topic	Chemical properties of spilled products
References	Appendix F2 – Oil Pollution Prevention Plan and Oil Pollution Emergency Plan
Summary	Specific impacts from oil products are not provided.
Detailed Review Comment	Although the document includes Safety Data Sheets (SDS) for Jet A-1 and Ultra-Low Sulphur Diesel, it does not elaborate on their specific impacts on water quality or mitigation strategies for these impacts.
Recommendation/ Request	Unless already described in another document, adding mitigation strategies for impacts on water quality from oil products would enhance the response plan and contribute towards due diligence.
Importance	Moderate

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KIA-NIRB-28

Review Comment Number	KIA-NIRB-28
Subject/Topic	Mapping of fish habitat
References	Appendix F.3 - Spill Contingency Plan Appendix 3: Environmental Resource Maps Figures 3.1-3.4 and Appendix 4: Responses to comments on Previous Plan Versions Table 4.1
Summary	Fish habitat is not mapped in environmental sensitivity mapping figures.
Detailed Review Comment	KIA previously requested that mapping of freshwater and marine fish habitat be included as part of the sensitivity mapping used to inform spill response (KIA comment KIA-6 in Table 4.1 on the 2017 version of the Spill Contingency Plan). TMAC responded that fish habitat was included in the Environmental Resource Maps. However, no information on fish habitat is depicted on the four environmental sensitivity mapping figures (Maps A-D) provided in the revised Spill Contingency Plan. It is essential that fish habitat be identified on environmental sensitivity mapping so that, if a spill were to occur near or in water, appropriate and immediate action could be taken to avoid damage to these sensitive habitats.
Recommendation/ Request	Environmental sensitivity mapping should be updated to identify freshwater and marine fish habitat.
Importance	Moderate

KIA-NIRB-29

Review Comment Number	KIA-NIRB-29
Subject/Topic	Locations
References	Appendix F.4 - Water Management Plan - Table 3-1 (and elsewhere)
Summary	The plan is difficult to interpret without a map.
Detailed Review Comment	It is difficult to interpret the water management plan because the document does not include a map showing the locations of the facilities listed in Table 3-1.
Recommendation/ Request	The water management plan should include a map showing the locations of the facilities listed in Table 3-1.

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Importance	Moderate

KIA-NIRB-30

Review Comment Number	KIA-NIRB-30
Subject/Topic	Monitoring parameter codes
References	Appendix F.4 - Water Management Plan - Table 5-1
Summary	The monitoring parameter codes cannot be interpreted without reference to an external document.
Detailed Review Comment	The meaning of the codes for groups of monitoring parameters in Table 5-1 is not clear (e.g. “G, N1, MT").
Recommendation/ Request	The parameter codes should be explained in a note appended to Table 5-1.
Importance	Moderate

Thank you.

John Roesch, P.Eng.

Senior Hope Bay Project Officer
Kitikmeot Inuit Association, Department of Lands and Environment

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment