AGNICO EAGLE

August 5, 2025

Keith Morrison
Nunavut Impact Review Board
29 Mitik Street, PO Box 1360
Cambridge Bay, Nu
X0B 0C0

Re: Agnico Eagle's Response to Comments on the 2024 Annual Reports for the Hope Bay Project, Project Certificate No. 003 and Project Certificate No. 009

Dear Mr. Morrison

Agnico Eagle thanks the Kitikmeot Inuit Association, Crown-Indigenous Relations and Northern Affairs Canada, Environment and Climate Change Canada, Fisheries and Oceans Canada, Government of Nunavut, Health Canada, and Transport Canada for their comments and review on the 2024 Annual Report for the Hope Bay Mine. Our comments are provided in the enclosed.

Should you have any questions or require further information, please contact the undersigned at your convenience.

Regards,

Colleen Prather
Colleen.prather@agnicoeagle.com
Permitting & Regulatory Affairs Superintendent

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KITIKMEOT INUIT ASSOCIATION (KitIA)

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-01**
Re:	**Sampling Locations**		

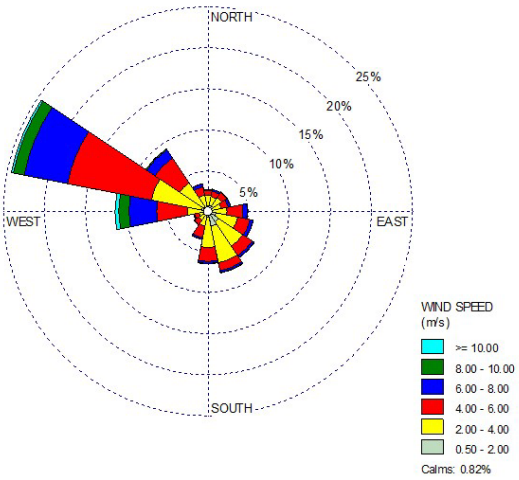
Request Made by Interested Party:
The KIA requests the following:

- *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).*

Agnico Eagle's Response to Request:
Response to bullet 1)
The location of DFA1 was reviewed and approved by ECCC and the NIRB in 2017. The objective of this station is to represent general Doris site air quality, not air quality within the mill/camp area. Due to its proximity to the mill in a predominantly downwind location, the measurements at this location are expected to provide a conservative representation of air quality throughout the Doris area.

Response to bullet 2)
The wind rose provided in Figure 4.9 of the report is noted as being for the period January to September 2024 and is not an annual wind rose, thus is not suitable for assessing the location of CDF4.

When a multi-year wind rose is considered (see image below), the predominant wind direction is west-northwesterly as opposed to the westerly direction seen in Figure 4.9. For the wind directionality seen in the wind rose below, CDF1 is well located to measure dustfall from the southerly to northerly extents of Quarry 2.



Response to bullet 3)

The rationale for the Madrid All-Weather Road sampling program is addressed in the response to KitIA-NIRB-05, below.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-02**
Re:	**Incorporating Air Dispersion Modeling Results in the Selection of Sampling and Monitoring Locations**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
Response to bullet 1)

The monitoring program description provided in Section 3 discusses the locations of the monitoring station with respect to criteria provided by the BC MoE and the US EPA. The process by which each location was chosen is not discussed in the Q1-Q3 reports. The rationales for locating each monitoring station are discussed in the Hope Bay Project Air Quality Management Plan (AQMP, December 2017).

The locations of the monitoring stations were developed with consideration of the dispersion modelling predictions in the 2017 FEIS, as discussed in the AQMP. The AQMP was submitted to both ECCC and the NIRB for their review and comment prior to implementing the current air quality monitoring program. The AQMP was also provided to the KitIA for their review and comment. The NIRB/ECCC approved monitoring locations have been in operation since 2018, with results from these locations being provided to the KitIA annually.

Response to bullet 2)

As noted in the AQMP and Table 3.1 of the Q1-Q3 2024 report, the objective of the NIRB/ECCC approved location of DFA1 is to represent general site air quality – it is not intended to sample the highest particulate concentrations. Due to its proximity to the mill, the measurements at this location are expected to provide a conservative representation of air quality throughout the Doris area.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-03**
Re:	**Updating Maps Showing Sampling/Monitoring Stations**		

Request Made by Interested Party:
The KIA requests the following:

- *Please add the operational-unit boundaries to these maps (Fig 3.1 and Fig 3.2).*

Agnico Eagle's Response to Request:
Agnico Eagle appreciates the comment. In future reports the locations of operations during the monitoring period will be included in the figures.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-04**
Re:	**Expected vs. Measured Dustfall Concentration at TIA-DF3**		

Request Made by Interested Party:
Please discuss why dustfall at TIA-DF3 was highest, contrary to the prior expectation that it would be minimal.

Agnico Eagle's Response to Request:
The ambient dustfall canister sampling method is subject to several external influences that can cause occasional discrepancies in the measurements. These can include algae growth in the canister, sample contamination by bird droppings, insects, etc. For the July samples, the elevated deposition measured at TIA-DF3 relative to the other samples is likely due to external contamination of the sample.

As noted in Table 3.1 (Note b), all dustfall measurements at the Doris site in August were below the laboratory detection limit and were therefore set to half the detection limit. Variations in the reported deposition values for August are due to differences in the laboratory detection limit for each sample.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-05**
Re:	**Assigning More Stations to the Road than to Other Sources**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
The dustfall sampling at the All-Weather Road is being conducted to address Term and Condition No. 1 of the NIRB Project Certificate No.009. This Term and Condition includes demonstration that implementation of dust suppression measures are within applicable guidelines and regulations. The upwind / downwind dustfall sampling demonstrates the effectiveness of the dust control mitigation applied to the road. This monitoring program is noted in the AQMP as a one-year program, but has been operated for several years. If approval of the Operational Update for the Hope Bay Site is received, Agnico Eagle will re-assess / update the AQMP to reflect the revised operations at the Doris and Madrid sites and these monitors may be re-located.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-06**
Re:	**Sampling Methods**		

Request Made by Interested Party:
The KIA requests the following:

- *Please clarify why the two canisters were merged rather than analyzed separately (as replicates)? Do the reported mg / 100 cm² values represent the average of the two canisters or the sum of their combined mass?*

Agnico Eagle's Response to Request:
The samples are combined by the laboratory, as analyzing a combined sample results in a lower minimum detection limit as the mass of the measured sample is greater than each individually. The laboratory then converts the measurements to an equivalent dustfall level in units of mg/dm^2-day considering the total mass of the two samples, the areas of both canisters, and the field sampling time.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-07**
Re:	**Handling Measurement Errors**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
Section 3.3.3 discusses screening for outliers and suspicious data. It does not refer to "measurement errors" as suggested by the KitIA, which is an inaccurate characterization for the monitoring program.

The data analysis for the particulate continuous monitors are conducted following the protocols provided by ECCC in the document National Air Pollution Surveillance Network Quality Assurance and Quality Control Guidelines (2021). This document provides QA/QC protocols for ambient monitoring data for various contaminants. For continuous particulate monitoring, these include:

- identifying periods of missing data (e.g., power failures)
- comparing data to upper and lower limits (e.g., physical limits, such as instrument thresholds)
- comparing to rate-of-change thresholds that indicate data has either changed too rapidly or not changed at all
- reviewing automated screening flags, instrument operational information and alarms
- reviewing 1-hour data for all parameters using tabular and graphical displays
- adjusting for zero noise (for particulate, values ≥ -3 µg/m^3 and <0 µg/m^3 are adjusted to 0 µg/m^3 and values <-3 µg/m^3 are flagged as invalid).

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-08**
Re:	**Linking High TSP Concentration with Wildfires**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
Response to bullet 1)
Agnico Eagle does not agree with the recommendation, based on the details provided in the responses below. In addition, the wildfire smoke assessment provided in the Q1-Q3 2024 report follows the same methodology used in the Q1-Q3 2023 report for a similar occurrence.

Response to bullet 2)
On August 9, 2024, the measured daily average TSP concentration is noted as being 85% of the Government of Nunavut 2011 air quality objective – there was no exceedance as stated in the KitIA-NIRB-08 comment.

A figure showing the active wildfires on August 6, 2024 is provided below, as long-range transport of wildfire emissions could take up to several days to travel over the distances involved. As seen in this figure, the active wildfires are very similar to those on August 9, 2024 (Figure 4.3 of the Q1-Q3 2024 report), as would be expected since the vast majority of these fires were in remote locations and uncontrolled.

The discussion in Section 4.3.1 focuses on the day of the maximum measured daily average TSP concentration, but as can be seen in Figure 4.4 of the Q1-Q3 2024 report, elevated daily average TSP concentrations were also measured in the days preceding and subsequent to August 9, 2024. The discussion in this section does not state that wildfires were only affecting the ambient measurements on a single day.

Active Wildfires on August 6, 2024

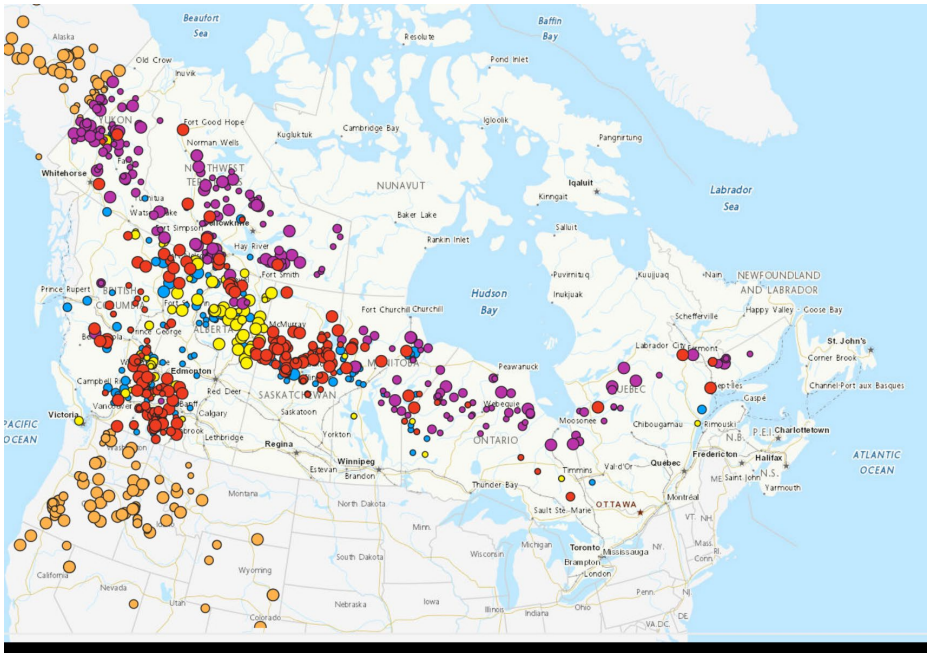
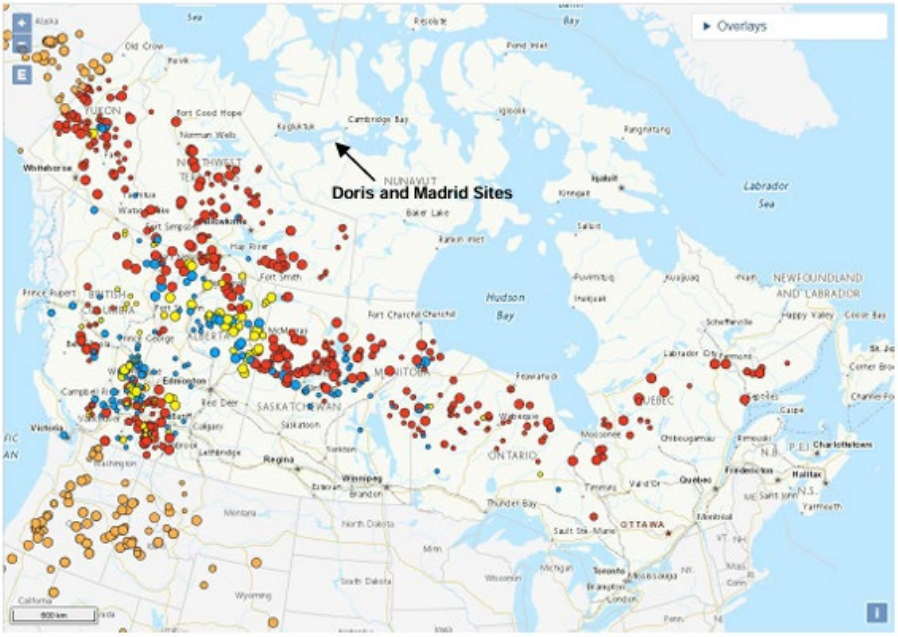


Figure 4.3 Active Forest Fires on August 9, 2024



Ref: Natural Resources Canada, Canadian Wildland Fire Information System available at https://cwfis.cfs.nrcan.gc.ca/home

Response to bullet 3)

On August 9, 2024 the highest hourly average TSP concentrations were measured for hours when the wind direction was blowing from the south-southwest, which is a direction for which the only active local particulate emissions source that was upwind of DFA1 was the All-weather Road. The mine was in care and maintenance during the Q1-Q3 2024 period and there were no mining or ore processing activities occurring during this period. The $PM_{2.5}$ proportion of typical unpaved road dust emissions (US EPA, AP-42, Section 13.2.2) is about 5% of TSP, which is inconsistent with the measurements, which show $PM_{2.5}$ as being about 81% of TSP. Given the lack of active local emissions sources that could produce this particulate size distribution, the most likely explanation for the elevated measurements is long-range transport of wildfire smoke with local emissions being a secondary contributor.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-09**
Re:	**Dustfall Readings for May and June**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
The laboratory analytical results are supplied in units of mg/dm^2-day based on the field sampling time of each measurement. These are then converted to units of mg/dm^2-30 days by multiplying by 30 (days) for comparison to the applicable criterion. If the two months were to be merged, the same value would be shown as that for the two months individually because of the time basis in the units used to express dustfall (30-days). This would potentially result in higher likelihood for misinterpretation than the current presentation in the report. This methodology has been previously used in Agnico Eagle reports that have been reviewed by the KitIA, NIRB, and ECCC. In future reports, if this situation occurs additional explanation of the results presentation will be included.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-10**
Re:	**Contributing Detection Limits into the Analysis**		

Request Made by Interested Party:
The KIA requests the following:

- *Please clarify how these below-detection-limit results were calculated for each station and month.*

Agnico Eagle's Response to Request:
The detection limit for each sample is determined and reported by the laboratory. The detection limit is not a single value but is variable due to the volume of each sample left for analysis and the number of days monitored.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-11**
Re:	**Formatting Issue**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
The level of precision presented in Tables 4.2 and 4.4 are consistent, with the exception of MDF09 for which the value is inadvertently presented as 18.0 rather than 18.

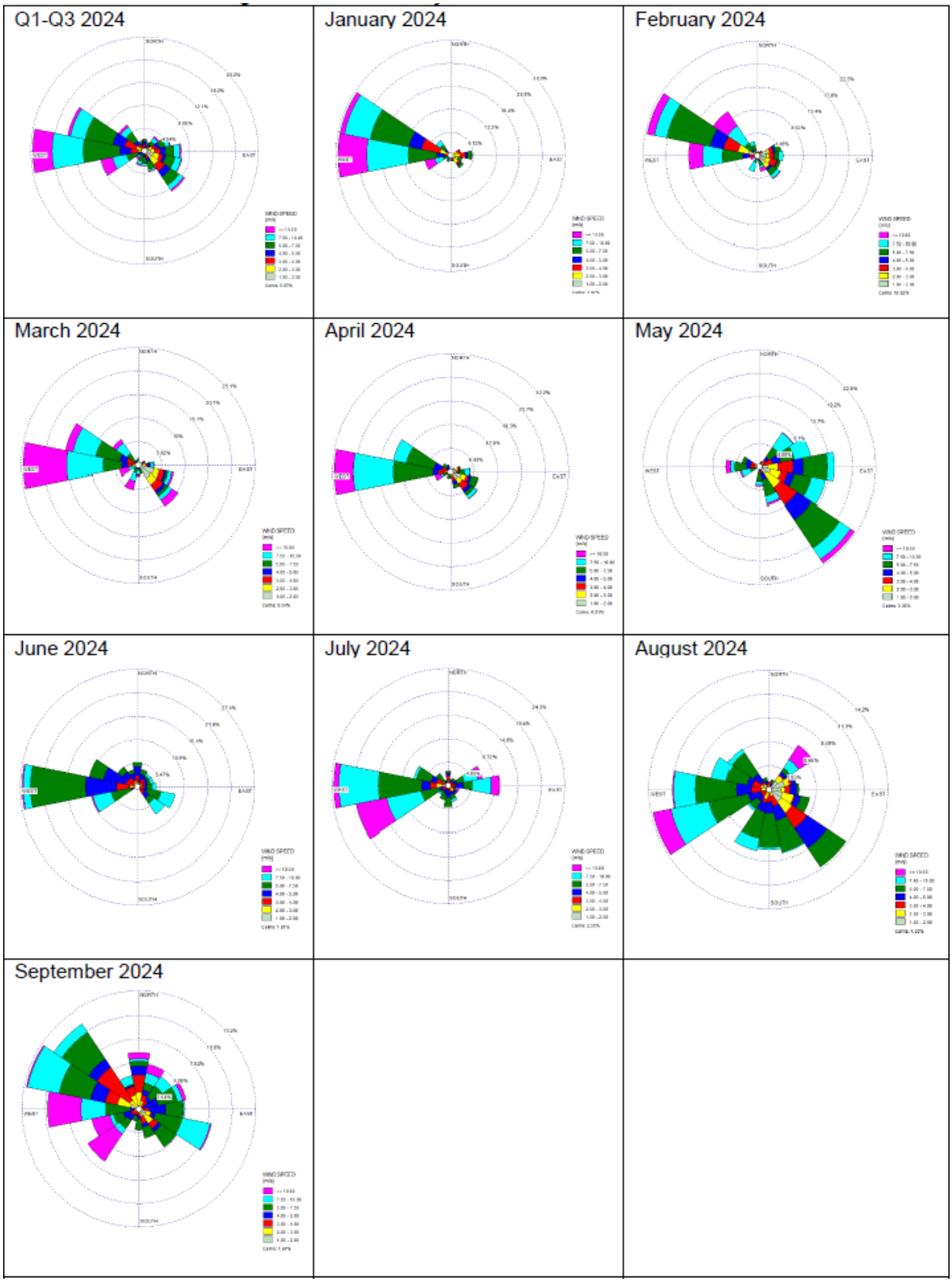
Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-12**
Re:	**Monthly Wind Rose Charts**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
The wind rose in Figure 4.9 is noted as being for the period of January to September 2024, which is the monitoring period presented in the report and is not an annual wind rose.

Monthly wind roses for the monitoring period are provided below and will be included in future reports.


Q1-Q3 2024
January 2024
February 2024
March 2024
April 2024
May 2024
June 2024
July 2024
August 2024
September 2024

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-13**
Re:	**Area with the Highest Concentration**		

Request Made by Interested Party:
The KIA requests the following:

- *Please double-check the text and clarify which area is expected to have the highest dustfall concentration.*

Agnico Eagle's Response to Request:
The maximum predicted monthly dustfall rate outside of 250 m from the TIA in the 2016 Amendment is 53 mg/100-cm^2/30-days. The note in Table 3.1 for TIA-DF2 is referring to the maximum predicted dustfall at a single location 300 m from the location of TIA-DF2 (i.e., the closest receptor in the 2016 Amendment dispersion modelling to the location of TIA-DF2). This wording will be clarified in future reports.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-14**
Re:	**High Dustfall Level at M-DFO4**		

Request Made by Interested Party:
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 abovementioned claim.*

Agnico Eagle's Response to Request:
During August 2024, no mining operations were occurring at Madrid North. The main activities at Madrid North during this month were construction of the Naartok East Pad about 800 m to the north-northwest of M-DF04, and construction of the Exploration Gravel Track which runs in a north-northwesterly to south-southeasterly direction and is west of M-DF04. At its closest, the Exploration Gravel Track is about 60 m from the monitoring station. Construction of the Exploration Gravel Track consumed 64,630 tonnes of rock. A monthly wind rose for August is shown in response to KitIA-NIRB-12. During this month, a predominant wind direction was westerly to west-southwesterly. The wind directionality and proximity of the Exploration Gravel Track to M-DF04 suggest that it was the dominant source contributing to the elevated dustfall measurement in August 2024.

Interested Party:	KitIA	Rec No.:	KitIA-NIRB-15
Re:	Edits and Changes to Table 1, Summary of the 2024 Wildlife Mitigation and Monitoring Plan Compliance Results		

Request Made by Interested Party:
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.

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 transit 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 % average.*
- *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 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 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 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 total events were observed in each of treatment and ZOI zones, as the word both could imply combined.*

Agnico Eagle's Response to Request:

Response to Bullet 1)

Yes, this information can be included in next year's annual report.

Response to Bullet 2)

These are the correct distances for helicopters and the same ones included in the WMMP. A minimum elevation of 610 m is required of fixed wing planes (included in the WMMP).

Response to Bullet 3)

The data collected was inconclusive. It could not be determined if the threshold was exceeded through the year during the periods of monitoring, the background ambient noise prevented accurate readings.

Response to Bullet 4)

The comment is acknowledged. The requirements for nests and the applicable non-disturbance buffer are followed.

Response to Bullet 5)

Date ranges will be included where possible in future year annual reports.

Response to Bullet 6)

Yes that is correct, 40% of the events were in the Treatment zone, 40% in the ZOI zone, and 20% in the Control zone.

Interested Party:	KitIA	Rec No.:	KitIA-NIRB-16
Re:	Edits and Changes to Table 1, Summary of the 2024 Wildlife Mitigation and Monitoring Plan Compliance Results		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
Agnico Eagle considers the traffic data collected adequate, and through discussions with the IEAC, is not a point of concern. Traffic data was compared with existing studies, described below, and concluded that no additional measures are required.

No additional wildlife protection measures were needed beyond continuing the mitigation already in place for wildlife encountering roads because the traffic levels at site are well below the levels at which studies have indicated levels impede wildlife movement. Daily averages and maximum daily transits were below 85 (ERM 2025, Section 2.2.3). As stated in the FEIS (TMAC 2017), studies in Alaska reported that caribou crossing of a pipeline road was impeded by traffic rates higher than 20 vehicles per hour (480 per day; Murphy and Curatolo 1984. Likewise, Murphy (1988) reported that caribou in the Kuparuk Oilfield in northern Alaska reported that road crossings by barren-ground caribou were only impeded once traffic rates were greater than 1 per minute (1,440 per day). Data collected from a variety of locations suggests that road traffic on the order of 4,000 to 10,000 vehicles per day begin to impose a barrier to movement to most large wildlife species, whereas roads with less than 1,000 vehicles a day are permeable to most species (Müller and Berthoud 1997).

Agnico Eagle believes the WMMP is robust with the appropriate level of mitigation and monitoring in place for the protection of wildlife. Additionally, site observations confirm that caribou cross the roads freely and traffic follows the WMMP to ensure nearby wildlife are not impacted.

References
ERM (ERM Consultants Canada Inc.). 2025. Hope Bay Project 2025 Wildlife Mitigation and Monitoring Program Compliance Report. Prepared for Agnico Eagle Mines Limited. Ref No. 0738548-03. April 2025.

Müller, S. and G. Berthoud. 1997. Fauna and traffic safety. Lavoc, Lausanne, Chapter 1, 19pp.

Murphy, S. M. 1988. Caribou behavior and movements in the Kuparuk oil field: implications for energetic and impact analyses. In Proceedings of the Third North American Caribou Workshop. Alaska Department of Fish and Game, Juneau, Alaska, USA. Wildlife Technical Bulletin, 8: 196-210.

Murphy, S. M. and J. A. Curatolo. 1987. Activity Budgets and Movement Rates of Caribou Encountering Pipelines Roads and Traffic in Northern Alaska USA. Canadian Journal of Zoology, 65 (10): 2483-90.

Smith, W. A. and R. D. Cameron. 1985. Reactions of large groups of caribou to a pipeline corridor on the Arctic Coastal Plain of Alaska. Arctic, 38 (1): 53-57.

TMAC (TMAC Resources Inc.). 2017. Madrid-Boston Project Final Environmental Impact Statement. Toronto, ON.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-17**
Re:	**Grizzly Bear Attraction to Site**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
The FEIS prediction related to grizzly bear attraction to site is best measured using the camera analysis results of which in 2023 (ERM 2024) indicated that grizzly bears were not being attracted to the site. This quantitative and analytical method is the most robust determination of avoidance or attraction. When last run in 2023 this analysis showed that grizzly bears were being neither attracted to nor avoiding the Mine site, which has been a consistent finding since analysis began.

The area surrounding the Mine includes the ocean coastline and several rivers with large char runs and supports a robust population of grizzly bears. The camera analysis indicates that grizzly bears are not observed more frequently near the Mine than further away, meaning that they are not as a population attracted to the Mine. Given the number of grizzly bears in the area, there are always going to be a low level of interactions which need to be managed effectively for both bears and personnel to remain safe. Principally, there have not been any repeated interactions with the same bear at the same place, including the waste management facility and camps which bears may be most attracted to – which indicates that there aren't any bears habituated bears to the Mine in the area, and that waste management measures in place are effective.

Reference
ERM. 2024. Hope Bay Project: 2023 Wildlife Mitigation and Monitoring Program Compliance Report. Prepared by ERM for Agnico Eagle Mines Ltd. Calgary, AB

Interested Party:	KitIA	Rec No.:	KitIA-NIRB-18
Re:	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		

Request Made by Interested Party:
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).*

Agnico Eagle's Response to Request:
The reviewer is referring to calculating the relative abundance index (RAI) in which the number of camera detections are standardized to events per day or more commonly events per 100 days.

The statement that the tables are "not useful" is incorrect as all the required information is still presented in the table and information regarding the relative abundance can be gleaned without including a RAI column.

It is noted that this calculation has not been included previously in the reports and has not been requested until this comment. The purposes of the tables historically were to summarize the data prior to the analysis in which RAI was considered.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-19**
Re:	**Spelling Errors in Appendices, Especially in Comments Sections**		

Request Made by Interested Party:
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.*

Agnico Eagle's Response to Request:
The points raised by the KitIA in their detailed comments are noted; however, the spelling in the comments of these raw data appendices is inconsequential to any data summary or analyses processes.

Prior to analysis, all data is standardized and QAQC completed to ensure that only one spelling is used per unique species entry. Prior to analysis data, cleaning in R is completed to ensure that all spelling is consistent and that typos are not present in the data.

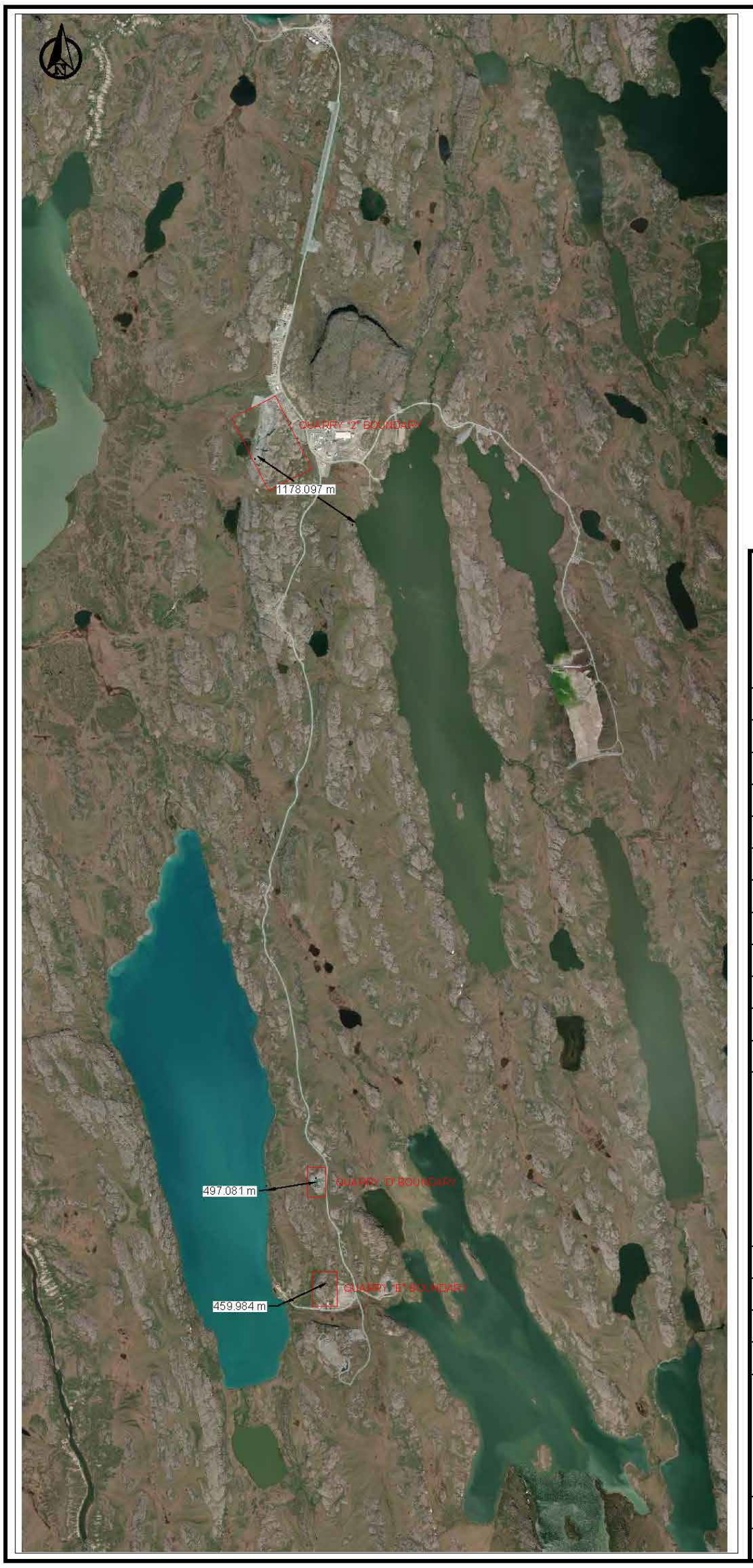
Moving forward in future WMMP reports alpha codes for avian species will be replaced with common names and Latin names as suggested.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-20**
Re:	**Noise Abatement – Blasting**		

Request Made by Interested Party:
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.

Agnico Eagle's Response to Request:
A map of 2025 blasting sites is shown below in red.

Hope Bay currently uses a Blast Monitoring Program which follows DFO guidelines for blasting and mitigations for fish habitat. Hope Bay will maintain records of compliance data, and refer to the document for any required mitigation.



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HAMEL ARPENTAGE

Révisions précédentes / Previous revisions

Rev	Description	Date	Par By

Dessins en référence/Reference Drawing

Dessin Drawing	Date
Dessin Drawing	Date
Dessin Drawing	Date
Dessiné par Drawn by	Date

Notes

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Approuvé par Approved by: N/A	Date: N/A
NO. Projet Projet NO.: 6209-142	
Date d'envoie Date of dispatch: 29th of July 2025	

Titre
Tittle

Agnigo Eagle division (AEM)
Hope Bay
Quarries locations

Échelle Scale: 1:40 000	FICHIER FILE: Quarries location (2025-7-29).DWG
No. DESSIN DRAWING NO.: 6209-142	Rev.: 1 — Page: 1 / 1

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-21**
Re:	**Fish Habitat (Water Level)**		

Request Made by Interested Party:
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.

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

Agnico Eagle's Response to Request:
Water level data during the 2024 ice-covered season could not be collected due to equipment failure, limited survey personnel on-site due to the site being in the Care and Maintenance phase, and unsafe ice conditions. The RTK unit arrived malfunctioning and required offsite repair. By the time it was returned, ice conditions had deteriorated, preventing safe access and accurate measurements.

Agnico Eagle clarifies that Doris Lake was the only lake that has a hydrology station to provide water level data necessary for estimations of ice levels. As such, there is no data to calculate estimations for other lakes. Because we are in Care and Maintenance, there is little to no activity that affects Windy, Patch, Imniagut, P.O., Ogama, or Little Roberts.

Going forward, Agnico Eagle is working to have backup equipment available where possible. Additionally, in future, water level sensors are planned for installation to reduce reliance on manual surveys and mitigate risks related to equipment failure or unsafe ice conditions.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-22**
Re:	**Fish and Fish Habitat**		

Request Made by Interested Party:
Provide a summary of all evaluated variables with direction and relative proportional changes from the comparisons.

Agnico Eagle's Response to Request:
To avoid misinterpretation, particularly where changes are not project-related, directional trends for statistically significant results are described in the main text with appropriate context. Agnico Eagle will consider including direction and relative proportional changes in future reports where it enhances clarity and aligns with the intent of the AEMP Plan.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-23**
Re:	**Chlorophyll a Fluctuations**		

Request Made by Interested Party:
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.

Agnico Eagle's Response to Request:
As detailed in the Aquatic Response Plan for Phytoplankton Biomass (Agnico Eagle 2023), submitted with the 2023 Annual Report as Appendix D, the fluctuations in chlorophyll *a* in Doris Lake are explained by the lake's sensitivity to climate-driven changes common in Arctic and sub-Arctic ecosystems. Earlier spring thaw and delayed fall freeze-up are extending the growing season and increasing light availability, which enhances phytoplankton productivity. Eutrophic lakes, like Doris Lake, are more responsive to these changes than ultra-oligotrophic lakes like the reference lake. Additionally, differences in lake characteristic (e.g., depth, catchment area, and nutrient inputs) mean that regional environmental shifts do not affect all lakes equally.

References:
Agnico Eagle. 2023. Aquatic Effects Monitoring Program – Aquatic Response Plan for Phytoplankton Biomass. March 2024.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-24**
Re:	**Lake Level Elevation**		

Request Made by Interested Party:
Remove 'No Effect' from Column 3 and provide a suitable replacement that indicates no conclusion.

Agnico Eagle's Response to Request:
As the reviewer has noted "*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*." By including the footnote with the "No Effect" conclusion, the intention was to clarify that, in the absence of complete data, no definitive conclusions were drawn regarding lake level changes. This approach was meant to communicate data limitations while ensuring that the report did not imply unsupported findings.

However, Agnico Eagle acknowledges the potential for misinterpretation and will ensure that future reports do not include a "No Effect" statement—whether in the main text or footnotes—when no conclusion can be drawn due to insufficient data.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-25**
Re:	**Infrastructure and Maintenance**		

Request Made by Interested Party:
Unless already described in another document, erosion control measures should be described for ongoing construction activities occurring on site.

Agnico Eagle's Response to Request:
Erosion control measures are covered in the *Water Management Plan* under Section 5.2 – Erosion Management and Mitigation Measures and copied below:

> *Effective erosion and sediment control measures will be installed prior to construction work commencing to minimize the potential for the introduction of sediment into watercourse or waterbodies. Slopes from containment berms that contain loose or erodible, will be fortified under the direction of a QEP. An adequate supply of erosion and sediment control contingency supplies will be maintained at the site. The speed of any flowing water on site, specifically during periods of tundra discharge, will be minimized since the erosive power of flowing water increases exponentially with velocity (speed). Supplies include: Silt fence Tarps Polly sheeting Sandbags Hand tools Geotextile Erosion control matting (with anchors) Trach pumps (with suitable lengths of hose).*

The Water Management Plan was provided as Appendix F.4 in the 2024 NIRB Annual Report.

References:
Agnico Eagle. 2025. Doris-Madrid Water Management Plan. January 2025.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-26**
Re:	**Water Quality Monitoring**		

Request Made by Interested Party:
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.

Agnico Eagle's Response to Request:
The *Hope Bay Spill Contingency Plan* outlines spill investigation steps (Section 3 – Spill Investigation, Documentation and Reporting), while the *Hope Bay Hydrocarbon Contaminated Material Management Plan* details procedures for managing hydrocarbons.

The Spill Contingency Plan was provided as Appendix F.3 in the 2024 NIRB Annual Report, and the Hydrocarbon Contaminated Material Management Plan can be found on the NIRB Registry ID No. 314686.

References:
Agnico Eagle. 2025. Hope Bay Spill Contingency Plan. March 2025.

TMAC Resources Inc. 2017. Hope Bay Hydrocarbon Contaminated Material Management Plan. December 2017.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-27**
Re:	**Chemical Properties of Spilled Products**		

Request Made by Interested Party:
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.

Agnico Eagle's Response to Request:
The *Hope Bay Spill Contingency Plan* includes details of the spill response procedures to be followed in the event of a spill (Section 3 – Spill Investigation, Documentation and Reporting).

The Spill Contingency Plan was provided as Appendix F.3 in the 2024 NIRB Annual Report.

References:
Agnico Eagle. 2025. Hope Bay Spill Contingency Plan. March 2025.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-28**
Re:	**Mapping of Fish Habitat**		

Request Made by Interested Party:
Environmental sensitivity mapping should be updated to identify freshwater and marine fish habitat.

Agnico Eagle's Response to Request:
Agnico Eagle considers any fish bearing stream or water body to be environmentally sensitive habitat and would take appropriate and immediate action to protect these areas in the case of an incident. Features including sensitive shorelines, streams, drainage areas and associated habitat are highlighted in the existing Spill Contingency Plan maps. For example, areas where streams empty into the ocean are captured. Agnico Eagle will update the sensitivity maps to clearly state that all streams and water bodies are considered sensitive habitats.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-29**
Re:	**Locations**		

Request Made by Interested Party:
The water management plan should include a map showing the locations of the facilities listed in Table 3-1.

Agnico Eagle's Response to Request:
Agnico Eagle agrees with the reviewer's comment and will include a map, showing the locations of the facilities in the next update of the Water Management Plan. The map will be similar to what was provided in NIRB Annual Report as Appendix B – Site Layout.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NIRB-30**
Re:	**Monitoring Parameter Codes**		

Request Made by Interested Party:
The parameter codes should be explained in a note appended to Table 5-1.

Agnico Eagle's Response to Request:
Parameter codes were taken from the Type A Water Licence 2AM-DOH1335 (Schedule I, Table 1), extracted below for reference. In the next update of the Water Management Plan, Agnico Eagle will explain these parameter codes and include a reference to the Water Licence.

Nunavut Water Board | Amended Water Licence No: 2AM-DOH1335

Schedule I: Conditions Applying to General and Aquatic Effects Monitoring

TABLE 1 – MONITORING GROUP

G	General	pH	pH units
		TSS	mg/L
N1	Nutrients, nitrogen group	Total Ammonia-N	mg-N/L
		Nitrate-N	
		Nitrite-N	
N2	Nutrients, phosphorus	Orthophosphate-P	mg/L
		Total Phosphate-P	
MT	Total Metals (Unfiltered)	T-Aluminum	mg/L
		T-Arsenic	
		T-Copper	
		T-Iron	
		T-Nickel	
		T-Lead	
		T-Zinc	
MD	Dissolved Metals (Filtered)	D-Iron	mg/L
		D-Copper	
		D-Arsenic	
		D-Zinc	
		D-Cadmium	
		D-Nickel	
B	Biological	Biological Oxygen Demand	mg/L
		Fecal Coliforms	CFU[1]/100 mL
HC		Total Oil and Grease	mg/L

[1] Colony Forming Units

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CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC)

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-NIRB-01**
Re:	**Effluent Water Treatment Plant**		

Request Made by Interested Party:
CIRNAC recommends that Agnico Eagle provide:

a) *An update on the operational status of the EWTP (e.g., readiness, use in 2024, anticipated use in the future, etc.); and*
b) *If effluent was processed by the EWTP in 2024, details regarding the plant throughput, treatment efficiency and effluent water quality*

Agnico Eagle's Response to Request:
Response to bullet a)
Commissioning activities for the EWTP were done in 2024, including the following activities:

- Leak testing of tanks and piping,
- Electrical and programming checks (equipment start/stop and control loop testing),
- Mechanical tests (pump operation and valve functionality), and
- Process commissioning (chemical injection tests for water treatment).

Response to bullet b)
Throughout 2024, effluent within the TIA contained low TSS levels. Water quality monitoring at sampling location RBD-1 indicated that TSS concentrations remained below 15 mg/L, confirming that treatment was not necessary. During the Care and Maintenance period, it is anticipated that treatment of TSS will only be required periodically.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-NIRB-02**
Re:	**Effluent discharges from the Madrid and Boston Mines**		

Request Made by Interested Party:
CIRNAC recommends that Agnico Eagle:

a) *Describe the management and discharge of any contact water collected at the Madrid and Boston Mines in 2024; and*
b) *Provide the requested information in future Annual Reports.*

Agnico Eagle's Response to Request:
Water management activities at the Madrid and Boston sites are described in the 2024 NWB Annual Report. At Madrid, contact water was collected and contained within the Madrid North Contact Water Pond (MMS-1). In accordance with the Water Management Plan, sampling was conducted and confirmed that water met discharge criteria. Following notification to the Inspector, a total of 1,414 m^3 was discharged to tundra in accordance with regulatory requirements.

At Boston, contact water was consolidated in the Containment Pond (BOS-2), which received runoff from smaller fuel containment berms and the Bulk Fuel Storage Facility. In accordance to the Water Management Plan, sampling was conducted and confirmed that water quality met criteria outlined in Part D, Item 15 of the 2BB-BOS1727 water licence for industrial use. A total of 50 m^3 was used as dust suppressant within the Boston mine infrastructure.

Agnico Eagle will include a summary as above in future reports, as detailed results are provided to the NWB per the Water Licence conditions.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-NIRB-03**
Re:	**Reportable Spill Detailed Reports**		

Request Made by Interested Party:
CIRNAC recommends that Agnico Eagle include detailed follow-up reports of all reportable spills in an appendix to future Annual Reports.

Agnico Eagle's Response to Request:
Agnico Eagle does not support including follow-up spill reports in the Annual Report, as the appropriate documentation is already provided to required parties. Specifically, each reportable spill is submitted to GN Spill Reporting Hotline, ECCC, KitIA, DFO, CIRNAC, and internal contacts, as per standard procedure. Initial reports are sent to aforementioned regulators within 24 hours of the spill occurring, and a follow-up report is shared with the same regulators within 30 days.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-NIRB-04**
Re:	**North Dam Cooling System**		

Request Made by Interested Party:

CIRNAC recommends that Agnico Eagle provide an overview of the North Dam Cooling System and its performance, with a focus on the reduction of potential environmental impacts.

Agnico Eagle's Response to Request:

Details with respect to the North Dam Cooling system are summarized in the Annual Geotechnical Inspection reports, as part of the NWB process. The following is a summary of the cooling system, as provided in the 2024 Annual Geotechnical Inspection – Doris Tailings Impoundment Area (Appendix I.2 of Agnico Eagle's 2024 NWB Annual Report).

Since the accelerated warming trend was observed in September 2023 (Table 4-5 of the 2024 Annual Geotechnical Inspection – Doris Tailings Impoundment Area), Agnico Eagle increased frequency of ground temperature cables (GTC) monitoring to every two weeks, data review, meetings with the independent review board members and thermal modelling have been ongoing since the observations. Additional mitigation measures also included reducing the water level on the upstream side (to reduce thermal loading) and implementation of an active cooling system on the passive thermosyphons.

The passive thermosyphon system was converted to a hybrid thermosyphon system in July 2024. The hybrid thermosyphon active refrigeration has effectively reduced the peak temperatures in 2024 and are expected to continue to remove heat from the foundation in subsequent years (section 4.2.3 of the 2024 Annual Geotechnical Inspection – Doris Tailings Impoundment Area). The south bank of thermosyphons are operational since July 11, 2024. The north bank active cooling system was operational from July 11 to September 20, 2024; however, stopped operating due to issues with the refrigeration unit. Passive cooling resumed in November 2024.

The data collected to the end of December 2024 indicate core temperatures have continued to decrease as the thermosyphons become operational and the surface boundary cools with the air temperature. The GTCs will continue to be closely monitored in support of the additional review meetings and thermal modelling which are ongoing.

As of July 2025, the active cooling system is functioning as designed and monitoring data has shown that the elevated level of risk to the structure has been mitigated. The current thermal performance of the North Dam was reviewed in July 2025 by the Independent Review Board, the Design Engineer, and the Engineer of Record during an annual site visit led by the Site Geotechnical Engineer. Results of the July 2025 Annual Geotechnical Inspection will be included in the 2025 Hope Bay Annual Report, and will include an update of the performance of the active cooling system.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-NIRB-05**
Re:	**Community Involvement Plan**		

Request Made by Interested Party:

CIRNAC recommends that Agnico Eagle provide the NIRB a copy of its standalone Community Involvement Plan which reflects relevant stakeholders with respect to the Project.

Agnico Eagle's Response to Request:

Agnico Eagle has a standalone Community Involvement Plan (TMAC 2016) that reflects relevant stakeholders and is available on the NIRB Registry (ID# 314715).

References

TMAC Resources Inc. December 2016. Hope Bay Project Community Involvement Plan.

ENVIRONMENT AND CLIMATE CHANGE CANADA (ECCC)

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-NIRB-01**
Re:	**Wind Direction Inconsistency**		

Request Made by Interested Party:
ECCC recommends that the inconsistency in the predominant wind direction be reconciled.

Agnico Eagle's Response to Request:
Agnico Eagle appreciates the comment and acknowledges there is a typographical error and Section 4.2.1 should have stated, "*Winds were predominantly blowing from westerly directions through the sampling period",* in alignment with Table 4.5 and Section 4.5.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-NIRB-02**
Re:	**Training**		

Request Made by Interested Party:
ECCC recommends that a summary of training and exercises run in 2024 be provided in the annual report.

Agnico Eagle's Response to Request:
An overview of on-the-job training courses is provided each year in the Socio-economic Monitoring Program Report (ERM 2025), covering general training, health and safety training, job-specific training, and ERT/Mine Rescue training. Training, including annual spill response training, is reported under ERT/Mine Rescue training. This report was provided as Appendix D.3 to the 2024 NIRB Annual Report.

In 2024, there was 290 hours of advanced spill training and 192 hours of spill response training.

References:
ERM (ERM Consultants Canada Ltd.). 2025. Hope Bay Project: 2024 Socio-economic Monitoring Program (SEMP) Report. Project No. 0758076. April 2025.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-NIRB-03**
Re:	**Sources of Ignition**		

Request Made by Interested Party:

ECCC recommends that a statement be added to the spill response section specifying that sources of heat or ignition should be removed until the spilled substance has been identified (and it is confirmed that sources of heat or ignition do not pose a fire / explosion hazard in the vicinity of the spilled substance).

Agnico Eagle's Response to Request:

The Spill Contingency Plan already includes removal of ignition sources in Step 1 of Section 2.2 – Spill Incident Alerts as well as throughout Appendix 1 for product specific emergency response plans:

> *Any person on the Hope Bay mine site who observes an unanticipated discharge or spill will complete the following actions (Figure 1-1):*
>
> 1. *Assess the Site:*
>
> *Isolate/evacuate immediate area if required;*
>
> *Perform first aid if required and safe to do so;*
>
> ***Eliminate ignition sources – turn off vehicles, no smoking;***
>
> *Identify spilled material if possible and consult product Safety Data Sheet (SDS); and*
>
> *Estimate size and flow path of the spill.*

References:

Agnico Eagle. 2025. Hope Bay Spill Contingency Plan. March 2025.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-NIRB-04**
Re:	**General Mitigation Measures**		

Request Made by Interested Party:

ECCC recommends the Proponent consider including additional mitigation measures within the Spill Response Plan, to help mitigate the likelihood of leaks and spills. These include:

- *Section 4.3. Spill during Transfer*
  - *Fuel nozzles equipped with automatic shutoffs*
  - *Operators stationed at both ends of hoses during refueling operations, unless both ends of the hose are visible and accessible by one operator*
  - *Fuel remaining in hoses is discharged into equipment or returned to the storage container*
  - *Refuel at least 31 m from the normal high-water mark of any water body*
  - *Use of drip trays or absorbent mats at prevent drips when refueling vehicles or equipment in an area that does not have secondary containment*
  - *Provide adequate lighting at refueling areas*
- *Section 4.4. Spills from Equipment*
  - *Use of secondary containment for any equipment with a built-in fuel tank*
  - *Use of biodegradable hydraulic oil (when appropriate) for equipment that is working near or in water*
  - *Park vehicles and equipment at a location that is at least 31 m from the normal high-water mark of any water body*

Agnico Eagle's Response to Request:

Agnico Eagle will review these suggestions in relation to future SCP updates.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-NIRB-05**
Re:	**Secondary Containment**		

Request Made by Interested Party:

ECCC recommends that containment / secondary containment (i.e., type and size) be included for the hazardous substances at the Madrid North and Madrid South sites.

Agnico Eagle's Response to Request:

The points raised by ECCC are noted and Agnico Eagle will update Table C.1 in the next update to the Spill Contingency Plan to include a column for containment type.

Table C.1. Madrid North Fuel and Chemical Storage Total Quantities

Products Stored	Max. Quantity Stored	E2 Quantity	E2 Item / Cas#	E2 Hazard	Notes and Comments
Calcium Chloride	11,030 tonnes	Not Covered	N/A	N/A	
Diesel Fuel	~100 000L	2,500 m^3	221 / 68334-30-5	Pool Fire	5-12+ tanks

**Additional portable storage facilities may be used depending on Project activity.*
*** Facility not yet constructed*

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-NIRB-06**
Re:	**Secondary Containment Under Hose Couplings During Fuel Transfer**		

Request Made by Interested Party:
ECCC recommends that portable secondary containment under hose couplings be included in the list of pre-staged equipment before a fuel transfer takes place.

Agnico Eagle's Response to Request:
Agnico Eagle will consider this for inclusion in the next revision of the OPPP/OPEP.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-NIRB-07**
Re:	**Compliance Monitoring Comment**		

Request Made by Interested Party:
Refer to ECCCs submission for the summary of 2024 compliance monitoring.

Agnico Eagle's Response to Request:
We appreciate ECCCs detailed comments which summarize the results of ECCCs compliance reviews throughout 2024 including MDMER, Annual Effluent Monitoring Report, and the Annual EEM Report.

FISHERIES AND OCEANS CANADA (DFO)

Interested Party:	DFO	Rec No.:	DFO-NIRB-01
Re:	Underwater Noise		

Request Made by Interested Party:

Monitoring for marine wildlife in Roberts Bay has occurred for 2 years (2023 and 2024 shipping seasons) and as such, DFO expects a proposal outlining the Proponent's noise monitoring protocol that includes indicators and thresholds for impacts to marine mammals due to vessel noise in Roberts Bay.

DFO requests that they be consulted for the design of the noise monitoring plan to ensure that adequate data is being collected to develop appropriate indicators and thresholds. DFO reiterates, that underwater noise modelling, including baseline studies, is an essential component of the monitoring protocol for underwater noise.

The Shipping Management Plan should be updated to include noise level monitoring with appropriate indicators and thresholds.

DFO looks forward to collaborating with AEM on the marine mammal monitoring plan and for input on indicators and thresholds, mitigation measures, including considerations for underwater noise monitoring.

Agnico Eagle's Response to Request:

This inquiry is specific to NIRB Project Certificate (No.009) Term and Condition #33, which is as follows: *Condition #33: The Proponent shall develop a monitoring protocol for assessing disturbance to marine wildlife resulting from project-related underwater noise in Roberts Bay, and to facilitate assessment of the potential short term, long term, and cumulative effects of project-related noise (including vessel noise in Roberts Bay) on marine wildlife. The Proponent is expected to work with Fisheries and Oceans Canada to determine appropriate indicators and thresholds that can be used to determine if negative impacts on marine wildlife are occurring, and adaptive management measures to mitigate adverse impacts of project-related noise.*

In compliance with NIRB Project Certificate (No.009) Term and Condition #33, a baseline monitoring program was developed in 2023, and the Shipping Management Plan (Section 4; Agnico Eagle, 2024) was updated to include monitoring for marine wildlife in Roberts Bay during the shipping season to assess disturbance to marine wildlife resulting from mine-related underwater noise. The Marine Mammal Monitoring Standard Operating Procedure (SOP; ERM 2023) was developed to guide this baseline monitoring in Roberts Bay, with results of the surveys being reported in the Annual Wildlife Mitigation and Monitoring Program (WMMP) compliance reports for Hope Bay.

As per the Shipping Management Plan, a minimum of two years of baseline monitoring were to be used to inform appropriate indicators and thresholds to determine if disturbances to marine wildlife are occurring from vessel noise. After two years of monitoring, there were few (two or fewer) marine mammal observations, all of which were seals, during shipping activities in Roberts Bay.

The low number of marine mammal (specifically seal) sightings in Roberts Bay during shipping monitoring is consistent with Inuit Traditional Knowledge reported in the Naonaiyaotit Traditional Knowledge Project (NTKP) Report (Banci and Spicker 2016), baseline surveys in 2010 for the FEIS, and results from incidental sightings collected for the WMMP Compliance Report.

- The NTKP report from 2016 did not identify Roberts Bay as an important harvesting area.
- Baseline surveys in 2010 included aerial surveys of breathing holes during the early spring and ship-based survey during the open water season in summer. During ship-based surveys in summer, there was one sighting of a ringed seal at the entrance of Roberts Bay and no reported haul outs in Roberts Bay.
- In 2024, there were 8 incidental sightings of seals in Roberts Bay, 5 of which were during the open water shipping season, and there were 2 incidental sightings of seals in 2023.

It is the opinion of Agnico Eagle that the intent of Term & Condition #33 has been met. Additionally, the results are aligned and consistent with the Naonaiyaotit Traditional Knowledge Project (NTKP) Report and baseline surveys in 2010 for the FEIS.

As per the Shipping Management Plan, monitoring will be continued in 2025 and reevaluated on an annual basis.

Further, Desgagnés, Woodward, and NEAS are Green Marine certified and as of 2024 have achieved a ranking of Level 5, Level 3 and Level 5 respectively in the Underwater Noise category. The objective of this category is to “Reduce underwater noise made by ship operations to reduce impacts to marine mammals.”. A Level 5 ranking indicates that Desgagnés and NEAS exhibit “excellence and leadership” and Woodward exhibits “integrated management and quantified impacts”.

References:

Agnico Eagle (Agnico Eagle Mines Limited). 2024. Hope Bay Shipping Management Plan. March, 2024.

Banci and Spicker. 2016. Naonaiyaotit Traditional Knowledge Project Report.

Interested Party:	**DFO**	**Rec No.:**	**DFO-NIRB-02**
Re:	**Marine Mammal Monitoring Program**		

Request Made by Interested Party:
Proponent to implement a marine mammal observer program aboard shipping vessels. The protocol should be reviewed and approved by DFO and aim at effectively detecting and avoiding marine mammals during shipping.

An updated marine mammal monitoring protocol must be implemented for all vessels, regardless of the operational status of the mine. The avoidance of sensitive habitat(s) and incidental mammal sightings are not sufficient protocols, to effectively detect and avoid marine mammals during shipping.

Current monitoring does not ensure that marine shipping activities avoid adversely impacting marine mammals (Project Certificate No. 009, Term & Condition No.31), and does not "assess the environmental impact of the Project on Wildlife..." (Project Certificate No.003, Term & Condition No. 27), nor adequately "ensure that that marine shipping activities avoid seabirds and marine mammals" (Project Certificate No. 009, Term & Condition No.32)

A marine mammal observer should conduct a survey solely dedicated to detecting marine mammals a least once a day, as is common to other vessels in Arctic waters that service mining operations in Nunavut, such as Agnico Eagle Mines Limited's Meadowbank and Meliadine MMSO protocols.

DFO requests the Proponent prioritize marine mammal monitoring when vessels are travelling near identified key habitat for marine mammals along the shipping route. Significant concern is in the Tallurutiup Imanga National Marine Conservation Area.

The proponent to work with DFO to develop a updated Shipping Management Plan that includes monitoring measures for marine mammals.

Agnico Eagle's Response to Request:
Agnico Eagle emphasizes that it operates in compliance with the approved Shipping Management Plan.

Agnico Eagle reiterates that Hope Bay does not have a specific requirement in the Project Certificate for an MMSO Program. The Terms and Conditions of the Project Certificate does not require a marine mammal monitoring program on board the vessels. The vessel operators are trained to avoid sensitive habitat for birds and to avoid marine mammals, if they are observed. The marine mammal observer protocol for Hope Bay is to record incidental sightings and avoid groups of seabirds and/or marine mammals. None of the conditions require an observer program onboard the vessels.

Project Certificate No.009, T&C 31 and 32, as well as Project Certificate No.003, T&C 27 have specific objectives which are clearly outlined in the Shipping Management Plan and addressed in the annual WMMP report (incidental sightings, reporting vessel tracks to confirm avoidance of sensitive habitat, and incident reporting). Agnico Eagle is currently meeting the requirements under Project Certificate No.009, T&C 31 and 32, as well as Project Certificate No.003, T&C 27.

In addition, the NIRB deemed Agnico Eagle to be compliant with Project Certificate No.009 T&C 31 and 32 and Project Certificate No.003 T&C 27 in 2024, as indicated in their 2023-2024 Annual Monitoring Report (NIRB 2024).

Agnico Eagle maintains its position as provided to DFO on December 21, 2023 in response to the 2022 Annual Report comments, as well as August 2, 2024 in response to the 2023 Annual Report comments (Agnico Eagle 2023, 2024) which states:

> *"Per the above noted T&Cs, all vessels supplying the Hope Bay Project are required to avoid sensitive habitat, as identified in the Shipping Management Plan, Section 2 (PC 009, T&C 31), and to report any vessel strikes, Section 5.1 (T&C 32). Also, vessel crew are required to scan for sightings of marine mammals during shipping and to record incidental sightings (Section 3). Additionally, Agnico Eagle asks vessels to confirm sightings of marine mammals (minimum once per day). Results are reported to NIRB in the annual WMMP Report.*
>
> *Agnico Eagle has been attempting to work with DFO to ensure "that marine mammal mitigation measures common for all vessels in the Canadian Arctic are applied to project-contracted vessels as appropriate" (PC 009, T&C 31). Through these comments, DFO is demanding Agnico Eagle implement Marine Mammal Observer Program. However, there is no T&C related to the Hope Bay Project requiring a Marine Mammal Observer Program on shipping vessels nor is it common across all vessels in the Canadian Arctic. The NIRB directly addressed this issue Nunavut Impact Review Board Final Hearing Report Phase 2 Hope Bay Belt Project, NIRB File No. 12MN001 (NIRB 2018), stating "with respect to potential cumulative effects on marine mammals, the Board is of the view that it would be most appropriate for the Government of Canada to establish and implement standardized requirements that would pertain to all certified vessels transiting through Arctic waters, rather than placing the onus on proponents". If a marine observer program becomes a required standard mitigation for avoiding marine wildlife on shipping vessels, Agnico Eagle will participate in this program alongside all other vessels in the Canadian Arctic.*
>
> *PC 009, T&C 31 and 32, as well as PC 003, T&C 27 have specific objectives which are clearly outlined in the Shipping Management Plan and addressed in the annual WMMP report (incidental sightings, reporting vessel tracks to confirm avoidance of sensitive habitat, and incident reporting). Agnico Eagle is currently meeting the requirements under PC 009, T&C 31 and 32, as well as PC 003, T&C 27 and we feel this issue is resolved.*

References:

Agnico Eagle (Agnico Eagle Mines Limited). 2023. Hope Bay Project DFO Comments Received on the 2022 Annual Report. Submitted to the Nunavut Water Board. December 21, 2023.

Agnico Eagle. 2024. Agnico Eagle Responses to Comments on the 2023 Annual Report. Submitted to the Nunavut Impact Review Board. August 2, 2024.

NIRB (Nunavut Impact Review Board). 2024. 20232-2024 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Project. NIRB File No. 05MN047 and 12MN001. January 17, 2024.

Interested Party:	DFO	Rec No.:	DFO-NIRB-03
Re:	Aquatic Invasive Species		

Request Made by Interested Party:
Proponent to consider a Non-Indigenous Species/Aquatic Invasive Species Monitoring Program in alignment with the perceived risk level. After discussions with the proponent and understanding the number of vessels sailing to Roberts Bay, DFO considers Hope Bay shipping a low level of risk.

Proponent to provide specific monitoring and mitigation measure that are being conducted, including but not limited to any ballast water treatment, monitoring for aquatic invasive species, and any hull clean-up and maintenance protocols.

Agnico Eagle's Response to Request:
Given DFO's determination of **low risk level** at Hope Bay for non-indigenous species/aquatic invasive species, Agnico Eagle feels the same messages as conveyed in response to the 2022 and 2023 Annual Report Comments remain, and no further monitoring or mitigation is required.

As per Agnico Eagle's response to DFO's comment on the 2023 Annual Report, Agnico Eagle contracts Transport Canada certified shipping companies that are using standard and acceptable practices common for all vessels in the Canadian Arctic, complying with the requirements and shipping regulations related to the concerns DFO has expressed, including Project Certificate Terms and Conditions, the Shipping Act, and the Ballast Water Regulations. Agnico Eagle feels this issue is resolved.

The shipping companies (Woodward Group and Companies – Coastal Shipping Ltd., Groupe Desgagnés Inc. and Nunavut/Nunavik Eastern Arctic Shipping Inc. [NEAS]) servicing the Hope Bay Mine have confirmed that both monitoring and mitigation measures for aquatic invasive species is currently being done. Ballast water treatment is conducted by all contracted vessels, with procedures and systems complying with the D2 requirements indicated under the International Maritime Organization's Ballast Water Management Convention.

Groupe Desgagnés Inc. has indicated that monitoring and mitigation for aquatic invasive species is done through monthly visual hull inspection and underwater surveys, hull clean-up and maintenance protocols when indicated by underwater survey, and annual ballast water sampling. Desgagnés is currently engaged in a ballast water treatment systems efficiency study with Transport Canada until 2027.

Woodward Group and Companies – Coastal Shipping Ltd. has indicated that monitoring and mitigation for aquatic invasive species is done through coating vessel hulls with approved antifouling coatings and cleaning of hulls at dry dockings as required.

NEAS has indicated that monitoring and mitigation for aquatic invasive species is done through a Ballast Water Treatment System (BWTS) which is calibrated annually. aquatic invasive species is done through coating vessel hulls with approved antifouling coatings and sampling of ballast water annually.

Woodward and Desgagnés are Green Marine certified and as of 2024 have achieved the top ranking of Level 5 in the Aquatic Invasive Species category. NEAS is also Green Marine certified and has achieved a Level 4 ranking in the Aquatic Invasive Species category. The objective of this category is to “Reduce the risk of introducing and propagating aquatic invasive organisms and pathogens associated with ballast water discharges and antifouling.” A Level 5 ranking indicates that the company exhibits “excellence and leadership” in this category, while a Level 4 exhibits “new technologies and reduction targets.”

Interested Party:	DFO	Rec No.:	DFO-NIRB-04
Re:	Insufficient Marine Mammal Mitigation Measures		

Request Made by Interested Party:

Proponent to provide an updated list of marine mammal mitigation measures in the Shipping Management Plan that includes but is not limited to the following:

- *Adherence to all conditions within the Marine Mammal Regulations (SOR/93-56) of the Fisheries Act,*
- *500 m setback distances from marine mammal aggregations, not only seabirds. This mitigation measure should be explicitly stated in the Shipping Management Plan, and communicated to vessel operators,*
- *Adherence to an established vessel-based marine mammal observer program (see DFO comment 2),*
- *Marine mammals will be given the right of way,*
- *Vessels will not approach within 300 m of a walrus or polar bear,*
- *Ships will not separate individual members of a group of marine mammals from other members of the group.*

This request aligns with Project Certificate No. 009, Term and Condition 31 to ensure marine shipping activities avoid adversely impacting seabirds and marine mammals. The request aligns with mitigation measures that are employed on other vessels that service mining operations in Nunavut, such as Agnico Eagle Limited's Meadowbank and Meliadine mine sites.

Agnico Eagle's Response to Request:

The marine mammal regulations are provided to ship captains and follow the language provided in PC. No.009 Term and Condition 31. Agnico Eagle's Shipping Management Plan includes reference to appropriate marine mammal regulations and will include additional mitigation measures to the Plan (e.g., as outlined above) where appropriate upon its next revision. However, as outlined in response to DFO-02, Agnico Eagle will not be adding a vessel based marine mammal observer program at Hope Bay.

Interested Party:	**DFO**	**Rec No.:**	**DFO-NIRB-05**
Re:	**Guidance Packages for Vessel Operators**		

Request Made by Interested Party:
Updated marine mammal mitigation measures described in DFO comment 4 should be clearly stated within the guidance for vessel operators.

DFO requests to receive all materials that the Proponent provides to the vessel operators that is updated annually with new information as per Project Certificate 009, Term & Condition 31. This should be a thorough information packing describing the marine mammal mitigation measures, monitoring requirements, species identification guides, etc.

Agnico Eagle's Response to Request:
Agnico Eagle confirms that vessel operators are provided with the following documentation:

- Hope Bay Shipping Management Plan Awareness presentation, which includes a summary of the Shipping Management Plan, how to fill an incidental marine mammals and seabirds sightings datasheet, and what to do if there's a collision with a marine mammal or a group of seabirds;
- Incidental Marine Wildlife Sightings Form, used when marine wildlife is observed;
- Marine Mammals and Seabird Incident Report, used when there is accidental contact with marine mammals or seabirds ; and
- Hope Bay Shipping Management Plan.

See response to DFO-NIRB-04 for further details.

Interested Party:	**DFO**	**Rec No.:**	**DFO-NIRB-06**
Re:	**Noise Monitoring for the Protection of Fish**		

Request Made by Interested Party:

DFO requests the Proponent report noise monitoring in terms of thresholds for impacts on fish and abide by DFO recommended guidance as follows (Cotts and Hanna, 2005):

- *No explosive is to be detonated in or near fish habitat that produces, or is likely to produce, and instantaneous pressure change (IPC) (i.e., overpressure) greater than 50 kPa in the swim bladder of a fish.*
- *No explosive is to be detonated that produces, or is likely to produce, a peak particle velocity (PPV) greater than 13 mm/sec in a spawning bed during the period of egg incubation.*

DFO also requests to be notified if any exceedances of these thresholds take place during blasting operators.

Reference: Cotts, P., and Hanna, B. 2005. Monitoring ExplosiveBased Winter Seismic Exploration in Waterbodies, NWT 2000-2002. In Armsworthy, S.L., Cranford, P.J., and Lee, K. Offshore Oil and Gas Environmental Effects Monitoring: Approaches and Technologies. Pgs 493510.Battelle Press.

Agnico Eagle's Response to Request:

Hope Bay currently uses a Blast Monitoring Program which follows DFO guidelines for blasting and mitigations for fish habitat. Hope Bay will maintain records of compliance data, and refer to the document for any required mitigation.

GOVERNMENT OF NUNAVUT (GN)

Interested Party:	**GN**	**Rec No.:**	**GN-NIRB-01**
Re:	**Snowbank Monitoring**		

Request Made by Interested Party:
The GN requests that the Proponent undertake a review to confirm that snowfall during the monitoring program (2020–2023) was within climate norms and averages.

Agnico Eagle's Response to Request:
As was communicated in our response last year to the issue of snowbank height monitoring, during the review of the Madrid-Boston FEIS Addendum, the KitIA and GN requested more information on whether plowing of Mine roads would result in snowbanks that could alter wildlife movement. The Proponent made commitment GN-19:

> *"TMAC will implement a program to monitor and report snow bank heights along Project roads. This program will allow estimation of mean height and variance at a series of designated monitoring locations that are representative of snow conditions along the roads. This program will continue until operational snow management is characterized."*

Project Certificate No.009 Term and Condition 20 includes monitoring of snowbanks and requires an analysis of the effectiveness of mitigation measures.

Snowbank monitoring was conducted for four years (from 2020-2023) twice monthly and addressed the initial question of whether plowing the road would result in snowbanks that could impeded wildlife movement. These results indicated that snowbanks over most of the road averaged 9.6 cm in 2023 and below 15 cm in all monitoring periods, which would not prevent wildlife movement.

Commitment GN-19 indicated that the program will continue until operational snow management is characterized. Snow management has been characterized in multiple months over four years and so the program is discontinued. As communicated, Agnico Eagle discussed discontinuing these surveys with the IEAC at the July 2023 IEAC meeting. The IEAC, who after seeing the roads and snowbanks in person, did not have any issues with discontinuing this program and it was discontinued for the 2024 season.

Interested Party:	**GN**	**Rec No.:**	**GN-NIRB-02**
Re:	**Traffic Monitoring**		

Request Made by Interested Party:
The GN requests that the Proponent undertake the following:

1. *Justify the conclusion that no additional evaluation of wildlife protection measures was needed in 2024, despite several months of missing data during the reporting period.*
2. *Explain the absence of data for the Roberts Bay–Doris (camera 18) during the reporting period.*
3. *Describe how field equipment issues (e.g., camera card malfunctions) will be prevented in future years (e.g., system redundancy).*
4. *Provide additional details on vehicle composition (lightweight vehicles and heavy equipment) in future annual reports.*

Agnico Eagle's Response to Request:
Response to Bullet 1)
Agnico Eagle considered the traffic data collected, and after discussions with the IEAC, it was not a point of concern. Traffic data was also compared to existing studies, described below, and concluded that no additional measures are required.

No additional evaluation of wildlife protection measures were needed beyond continuing the mitigation already in place for wildlife encountering roads because the traffic levels at site are well below the levels at which studies have indicated levels impede wildlife movement. Daily averages and maximum daily transits were below 85 (ERM 2025, Section 2.2.3). As stated in the FEIS (TMAC 2017), studies in Alaska reported that caribou crossing of a pipeline road was impeded by traffic rates higher than 20 vehicles per hour (480 per day; Murphy and Curatolo 1984). Likewise, Murphy (1988) reported that caribou in the Kuparuk Oilfield in northern Alaska reported that road crossings by barren-ground caribou were only impeded once traffic rates were greater than 1 per minute (1,440 per day). Data collected from a variety of locations suggests that road traffic on the order of 4,000 to 10,000 vehicles per day begin to impose a barrier to movement to most large wildlife species, whereas roads with less than 1,000 vehicles a day are permeable to most species (Müller and Berthoud 1997).

As outlined in the answer below the data will be uploaded on a more consistent basis.

Response to Bullet 2)
Camera 18 experienced equipment failure and weather impediments during the reporting period. The camera was cleared of snow approximately once a month, however, performance checks were not conducted to ensure that the cameras were collecting data during these maintenance checks.

As mentioned in Response to Bullet 3), Agnico Eagle will rectify this moving forward with frequent equipment checks prior to and during camera deployments, as well as conduct snow clearing and where feasible in winter conditions, maintenance on cameras at a more frequent rate.

Response to Bullet 3)

To reduce re-occurrences of equipment malfunctions, Agnico Eagle will implement the following mitigation measures, where possible:

- Bi-weekly cleaning of snow/ice beginning November 1, 2025, for the two road monitoring cameras
- Implement a two-card system:
    - Swap the SD card (pre-loaded with winter programming) bi-weekly
    - Download card content to a portable USB drive
- Verify that card is operating and that images have been saved to the SD during the deployment period
- Document each camera check event using a tracking spreadsheet
- Submit USB drive to consultant after summer card swap completed.

Response to Bullet 4)

Agnico Eagle will include information regarding vehicle composition in future annual reports, beginning with the 2025 report.

References

ERM (ERM Consultants Canada Inc.). 2025. Hope Bay Project 2025 Wildlife Mitigation and Monitoring Program Compliance Report. Prepared for Agnico Eagle Mines Limited. Ref No. 0738548-03. April 2025.

Müller, S. and G. Berthoud. 1997. Fauna and traffic safety. Lavoc, Lausanne, Chapter 1, 19pp.

Murphy, S. M. 1988. Caribou behavior and movements in the Kuparuk oil field: implications for energetic and impact analyses. In Proceedings of the Third North American Caribou Workshop. Alaska Department of Fish and Game, Juneau, Alaska, USA. Wildlife Technical Bulletin, 8: 196-210.

Murphy, S. M. and J. A. Curatolo. 1987. Activity Budgets and Movement Rates of Caribou Encountering Pipelines Roads and Traffic in Northern Alaska USA. Canadian Journal of Zoology, 65 (10): 2483-90.

Smith, W. A. and R. D. Cameron. 1985. Reactions of large groups of caribou to a pipeline corridor on the Arctic Coastal Plain of Alaska. Arctic, 38 (1): 53-57.

TMAC (TMAC Resources Inc.). 2017. Madrid-Boston Project Final Environmental Impact Statement. Toronto, ON.

Interested Party:	**GN**	**Rec No.:**	**GN-NIRB-03**
Re:	**Aircraft Monitoring**		

Request Made by Interested Party:
The GN requests that the Proponent undertake the following:

1. *Where applicable, provide the minimum, maximum and mean of daily aircraft flights for comparison against FEIS predictions about daily flights.*
2. *Where applicable, provide flight logs that include information such as date, flight purpose, flight distance, flight's mean height above ground level (m), justification for low-level flights, wildlife observations made by the pilot and any course corrections made as a result.*

Agnico Eagle's Response to Request:
Response to Bullet 1)
Agnico Eagle will present the minimum, maximum, and mean of daily aircraft flights to compare against the predictions of the FEIS in next year's annual report.

Response to Bullet 2)
Agnico Eagle makes sure that aircraft and helicopter pilots are aware of and abide by the mitigation from the WMMP Plan from the section Aircraft Management. Agnico Eagle will provide available information from helicopter flight logs in future WMMP Compliance Report submissions. Details such as the flight above ground level for example, are not logged as helicopter pilots fly at certain heights based on specific tasks and as per the WMMP.

Interested Party:	**GN**	**Rec No.:**	**GN-NIRB-04**
Re:	**Wildlife Cameras**		

Request Made by Interested Party:
The GN requests that the Proponent:

1. *Clarify the rationale for the change in frequency of wildlife camera analysis.*
2. *Ensure the continued collection of wildlife camera data in the Boston area.*

Agnico Eagle's Response to Request:
Response to Bullet 1)
The camera monitoring program has been active in its current form since 2016 with data being analyzed each year. Results have been consistent in past monitoring years and are well within the levels predicted in the FEIS.

At the July 2024 IEAC meeting it was agreed to reduce the analyses to every three years given that the mine is in Care and Maintenance. Analyzing camera program data every three years rather than annually also aligns with other wildlife compliance monitoring programs in the Canadian Arctic, including the NWT.

Response to Bullet 2)
Additional baseline wildlife camera data is no longer being collected in the Boston area as there is no mining activity at this time; therefore, no wildlife effects due to the Mine are expected in this area. As stated in the comment responses for the 2023 Wildlife Compliance report, Agnico Eagle agrees with redeploying the Boston camera program one year prior to planned construction of mining infrastructure at Boston.

HEALTH CANADA (HC)

Interested Party:	**HC**	**Rec No.:**	**HC-NIRB-01**
Re:	**Analysis of Fine Particulate Matter Monitoring Results**		

Request Made by Interested Party:
HC recommends:

1. *Including a calculation of the 3-year averaging period for PM2.5 for comparison to the CAAQS in future monitoring reports.*

Agnico Eagle's Response to Request:
As identified in Nunami Stantec's report entitled, "*Q1-Q3 2022 Atmospheric Compliance Monitoring Program Report Doris and Madrid Project",* dated April 2023, the annual $PM_{2.5}$ data recovery rate for October 2021 to September 2022 was 60% which is below acceptable levels for calculating an annual average concentration.

As identified in Nunami Stantec's report entitled, "*Winter 2022-2023 Atmospheric Compliance Monitoring Program Report Doris and Madrid Project*", dated October 2023, the annual $PM_{2.5}$ data recovery rate for May 2022 to April 2023 was 54% which is below acceptable levels for calculating an annual average.

Accordingly, $PM_{2.5}$ data from 2022 were below the acceptable annual recovery rate of 75% and deemed invalid for calculating a 3-year average for comparison to the CAAQS.

It is anticipated the future reports will include the calculation of the 3-year average and comparison to the CAAQS providing the data recovery remains above 75%.

Interested Party:	**HC**	**Rec No.:**	**HC-NIRB-02**
Re:	**Exceedances in Dustfall**		

Request Made by Interested Party:
HC recommends:

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.*

Agnico Eagle's Response to Request:
Response to bullet 1)
Agnico Eagle intends to continue monitoring dustfall and analysis of the results and trends will be discussed in future annual reports.

Response to bullet 2)
As noted in the response to 2023 NIRB Annual Report Comments, Agnico Eagle meets with the Inuit Environmental Advisory Committee (IEAC) twice a year, which includes an on-site visit. IEAC members are Hope Bay area land users. As a note, only a few families are still traveling through the area. During IEAC meetings, Agnico Eagle presents environmental monitoring results and proposed adjustments to existing monitoring programs and IEAC members ask questions and discuss concerns.

Agnico Eagle believes this ongoing engagement with local land users addresses Health Canada's recommendation.

Interested Party:	**HC**	**Rec No.:**	**HC-NIRB-03**
Re:	**Updates to Noise Abatement Monitoring Plan**		

Request Made by Interested Party:
HC recommends consideration of the following updates to the Noise Abatement Monitoring Plan:

1. *Include the potential presence of off-duty human receptors and seasonal/traditional land users who may experience health impacts due to noise from current maintenance and exploratory activities.*
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.*

Agnico Eagle's Response to Request:
Response to bullet 1)
Agnico Eagle does not agree with the inclusion of off-duty human receptors in the Noise Abatement Monitoring Plan as noise exposure limits in Nunavut workplaces are found in the Consolidation of Mine Health and Safety Regulations under the territorial *Mine Health and Safety Act*. Agnico Eagle and its contractors must comply with the Mine Health and Safety Regulation requirements for the management and mitigation of workplace noise exposure.

With respect to seasonal/traditional land users, as outlined in the 2017 FEIS Human Health Risk Assessment (Volume 6, Section 5.4.1.4), adverse effects to human health are not likely to occur because the magnitude of the effects due to noise after mitigation were low or moderate at the identified human receptor locations. Residual effects are confined to the Project Development Area or Local Study Area, and are intermittent, of medium duration, and reversible. Including seasonal/traditional land user receptors in the plan is not warranted at this time.

Response to bullet 2)
Mining operations runs 24-hr a day; therefore, there will always be some noise. However, mitigations to reduce Mine-related noise are in place. For example, surface blasting occurs once a day and is only during the day. In the rare occasion there are two different surface blasts, site will synchronize the blasts. In addition, announcements occur on-site so that personnel are aware of blasts, where they are occurring, and at what time of day. Further, as outlined in response to bullet 1) above, Agnico Eagle follows H&S Regulations for its workforce.

Response to bullet 3)

No concerns have been raised by local land users with respect to noise levels as a result of activities from Hope Bay, nor have they been raised by the IEAC. While there are occasionally land users in the surrounding area, there are no communities close enough to be impacted by mine-related noise. The nearest community of Cambridge Bay is 125 km away and the Hope Bay area has a relatively low density of land users, making information distribution for events, such as blasting, unnecessary. Agnico Eagle has the Tusajuugut complaint mechanism. People can submit their complaint through this system and Agnico Eagle addresses concerns when they are received.

On-site, if workers have issues, they are encouraged to speak with their Supervisor, the Lodge Manager, or an HR representative.

Interested Party:	**HC**	**Rec No.:**	**HC-NIRB-04**
Re:	**Editorial note: incorrect guidance citations**		

Request Made by Interested Party:
HC recommends:

1. *Updating all relevant documents to include the most up-to-date CAAQS values.*

Agnico Eagle's Response to Request:
The data presented in the Q1-Q3 2024 report were collected through 2024, and accordingly the CAAQS applicable during 2024 were considered. As per the Canada Gazette, Part I, Volume 151, Number 49 (December 2017), the 2020 CAAQS were in effect until 11:59 PM, December 31, 2024. Subsequent air quality monitoring reports will consider the 2025 CAAQS and the references will be updated at that time. This change will also be incorporated into the Air Quality Management Plan during the next update.

TRANSPORT CANADA (TC)

Interested Party:	**TC**	**Rec No.:**	**TC-NIRB-01; TC-NIRB-02; TC-NIRB-03**
Re:	**Marine Transportation: Oil Handling Facility; Permits Navigation Protection Program; Editorial note: incorrect guidance citations**		

Comment Made by Interested Party:

TC-NIRB-01: *The oil handling facility complies with regulatory requirements as per part 8 of the Canada Shipping Act, 2001. Transport Canada's Environmental Response program conducted an inspection of the Oil Handling Facility in 2024 and identified updates required to the Oil Pollution Prevention Plan and Oil Pollution Emergency Plans related to proposed changes at the facility. Updates were completed and the plans are now compliant with the regulatory requirements pursuant to Part 8 of the Canada Shipping Act, 2001.*

The facility complies with the Marine Transportation Security Regulations and the certificate for the Occasional-use Marine Facility is current and valid. No marine security inspection was conducted by Transport Canada in 2024 and there is no marine security inspection planned for 2025.

No enforcement activity was undertaken or required by Transport Canada Marine Safety and Security Group last year.

TC-NIRB-02: *As noted in Table 2.1-1, Transport Canada's Navigation Protection Program (NPP) has issued three approvals for works associated with the Project:*

- *8200-02-6565 Installation of the jetty in Roberts Bay*
- *2018-600028 Approval for Jetty in Roberts Bay; and*
- *2018-600006 Approval for Marine Outfall Berm*

Regarding the three approvals and the Project:

- *NPP received no complaints about the navigation related to the project in 2024*
- *NPP did not carry out any inspections for the project in 2024*

TC-NIRB-03: *With respect to Transport Canada, in 2024,*

- *no Transportation of Dangerous Goods (TDG) approvals were issued.*
- *no TDG inspections were conducted.*
- *no TDG monitoring was conducted.*
- *no TDG complaints/concerns were received regarding this project.*
- *no TDG enforcement actions were required.*

Agnico Eagle's Response to Comments TC-NIRB-01, TC-NIRB-02, and TC-NIRB-03:

Agnico Eagle acknowledges Transport Canada's evaluation and appreciates the thorough review provided. We thank you for your time and attention in responding to our Annual Report and for your continued collaboration.