

June 28, 2024

Leah Klaassen
Impact Assessment Officer
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

Re: Comment Request for Agnico Eagle's Meadowbank Complex Project 2023 Annual Report

Dear Leah Klaassen,

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Agnico Eagle's 2023 Annual Report for the Meadowbank and Whale Tail Pit Project (Complex), NIRB File #s 03MN107 & 16MN056.

The GN has reviewed the proposed project and related documents and has fourteen (7) comments to share with the Board, which are appended to this letter.

The GN appreciates participating in the ongoing review and monitoring of this project through the NIRB process. Should there be any concerns or need for follow-up, please do not hesitate to contact me at jbuller@gov.nu.ca.

Qujannamiik,



Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

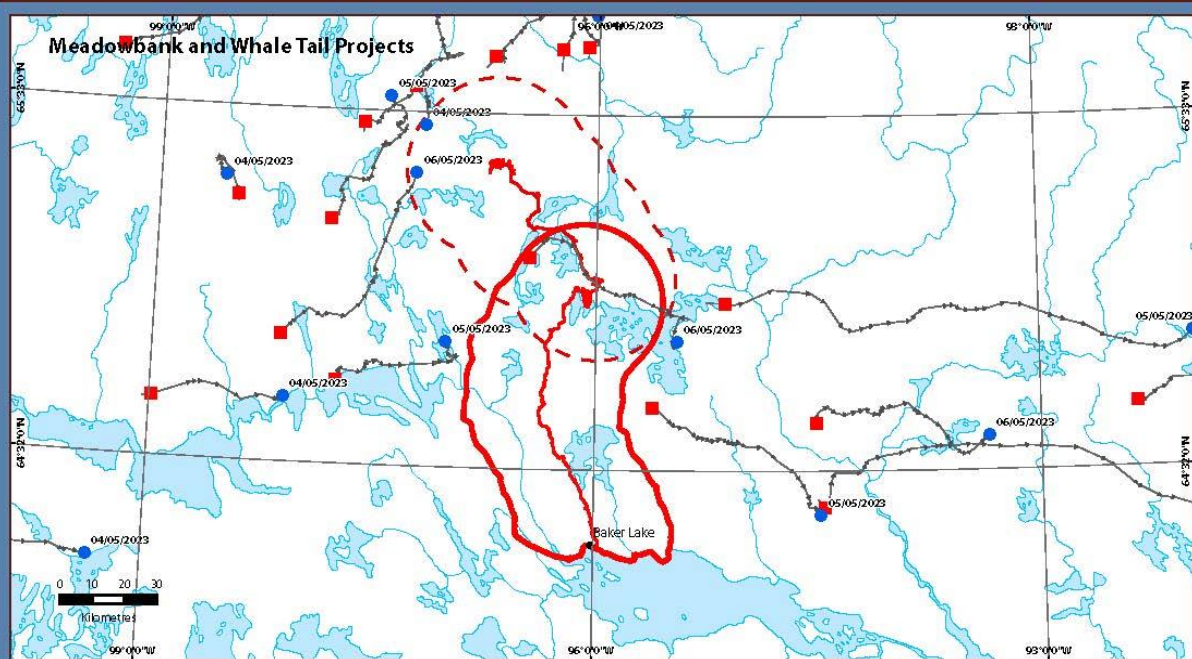
GN AR # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Pit and Mine Ground Surveys for Wildlife
Terms and Conditions	28 (Project Certificate No. 008, Amendment No. 1)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meadowbank Division. Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7 (June 2019). • Agnico Eagle Mines Limited. Appendix 39, Parts 1–5, Agnico Eagle Mines Limited – Meadowbank Complex 2023 Wildlife Monitoring Summary Report Annual Report (March 2024).
IDENTIFICATION OF ISSUE	
<p>The frequency of pit and mine ground surveys conducted in 2023, as reported in the Meadowbank Complex 2023 Wildlife Monitoring Summary Report – Appendix 39 (Appendix 39) (AEM, 2024) by Agnico Eagle Mines Limited (AEM or the Proponent), appears to be inconsistent with requirements of the Project's Terrestrial Ecosystem Management Plan (TEMP; AEM, 2019).</p> <p>The Government of Nunavut (GN) is concerned that the triggering of mitigation actions (e.g., suspension of non-essential vehicle circulation and operation of heavy equipment) would be impaired by the failure to engage increased pit and mine ground surveys during sensitive seasons. Mitigation actions are intended to reduce the disturbance of caribou within the vicinity of the Project.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Pit and mine ground surveys around the Whale Tail mine site are an important tool for detecting wildlife, such as caribou, near the Project and triggering mitigation actions such as stoppages of heavy equipment and circulation of non-essential vehicles. In the Project's TEMP (AEM, 2019) Figure 6: Thresholds for Monitoring and Mitigation of Caribou in Proximity to Mine Operations, lays out a decision tree for management of</p>	

Whale Tail mine operations in response to the presence of caribou (see Appendix A). This decision tree indicates that when at least 1 caribou (based on collar data) is within 50 km of the site the frequency of ground surveys is increased from once weekly (see Table 14: Monitoring Approach for Ungulates for the Project) to every two days (during sensitive seasons –Spring: April 1 to May 25 and Fall: September 22 to December 15) for at least 5 days; Frequency of ground surveys further increases to daily or twice daily if caribou, in groups above the Group Size Threshold (GST), are seen within 4 and 1.5 km of the mine site, respectively (Page 42).

Table 4-1: Number of Formal Pit and Mine Site Ground Surveys by Month, 2023, in Appendix 39 indicates that there were between 4 to 5 pit and ground surveys conducted each month in April, May, September, October, November and December for the Whale Tail site. This frequency of surveying indicates that caribou monitoring around the Whale Tail site remained at its lowest level prescribed by the TEMP during these months (i.e., 1 survey per week) and it appears that a higher frequency of pit and mine site surveys was not triggered in response to the presence of caribou.

The GN notes that the TEMP's threshold for increasing the frequency (i.e., from weekly to every second day) for pit and mine site ground surveys would have been triggered multiple times during the 2023 Spring Sensitive Season as a result of collar caribou data (see Figures 1–3) that the GN provides to AEM on a daily basis (Page 6-1; AEM, 2024). Figures 1–3 illustrate that collared caribou were within 50 km of the mine site, as such, these additional ground surveys in April and May should have been conducted. As a result, it appears that AEM did not follow this requirement of the TEMP at this time.

Table 4-2: Wildlife Observations from Formal Pit and Mine Site Surveys by Month 2023 of Appendix 39, indicates that 69 caribou were observed in April during the pit and mine ground surveys that were conducted in 2023 at the Whale Tail site. However, this number is presented as total number of caribou for the month. As such, the number does not provide clarity as to whether these caribou were in groups above the GST (i.e., 33 for the 2023 Spring Sensitive Season) or at what distance from the Project they were seen. Consequently, the GN cannot determine whether any monitoring or mitigation action was required under the TEMP's decision tree (Figure 6; AEM, 2019).



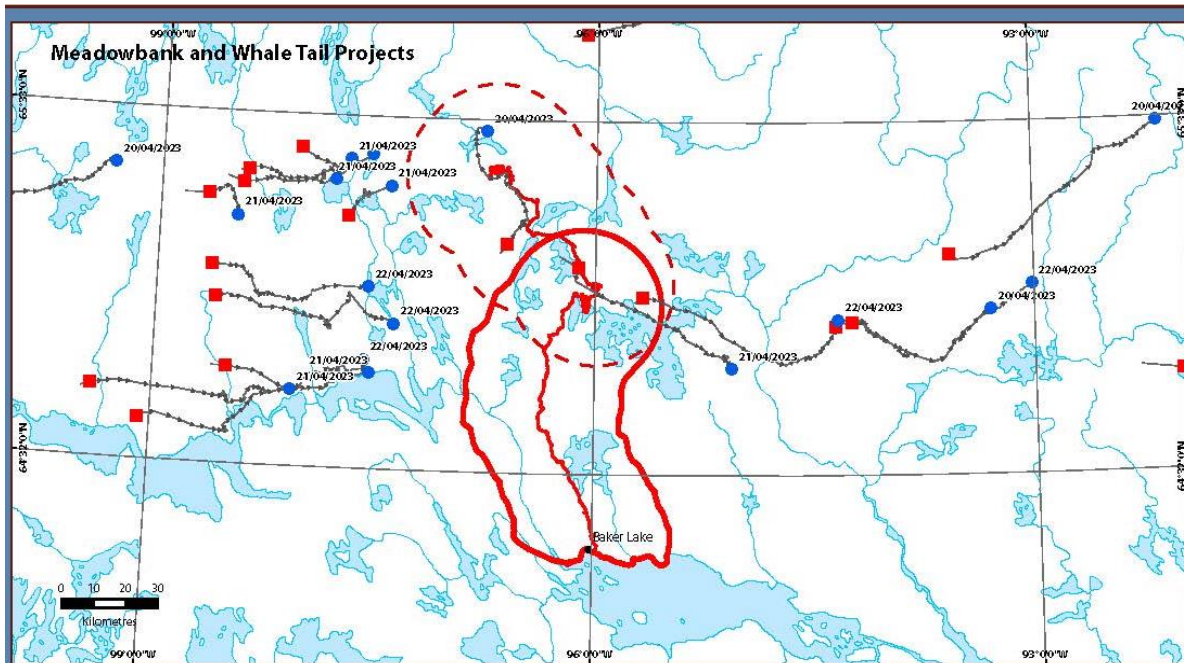


Figure 3. GN Radio Telemetry Collar Map – May 6, 2023

RECOMMENDATION(S)

The GN recommends the following regarding the above concerns:

- 1) AEM provide a detailed explanation as to why the frequency of pit and mine site ground surveys conducted at the Whale Tail Site in 2023 were not increased in April and May, as required by the TEMP (AEM, 2019).
- 2) AEM provide additional information with respect to the 69 caribou reported in April in Table 4-2 of Appendix 39. This should include the number of groups and their sizes and whether any of the groups were observed within 4 or 1.5 km of the Whale Tail site.
- 3) To demonstrate that the decision tree in Figure 6 of the TEMP (AEM, 2019) is being implemented, AEM should provide a table in all future reports that integrates the frequency of pit and mine site ground surveys at the Whale Tail Site, all observations of collared caribou within 50 km, and observations of caribou within 4 and 1.5 km. Additionally, this table should indicate any mitigation action taken in response to the caribou observations.

GN AR # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Collection of Caribou Collar Data
Terms and Conditions	29 (Project Certificate No. 008, Amendment No. 1)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meadowbank Division. Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7 (June 2019). • Agnico Eagle Mines Limited. Appendix 39, Parts 1–5, Agnico Eagle Mines Limited – Meadowbank Complex 2023 Wildlife Monitoring Summary Report Annual Report (March 2024). • Nunavut Impact Review Board. Project Certificate No. 008. (March 2018). • Nunavut Impact Review Board. Project Certificate No. 008, Amendment No. 001 (February 2020).
IDENTIFICATION OF ISSUE	
<p>Since 2018, the Proponent has been required to collect additional caribou collar data to assess Project effects on the movements of caribou under Project Certificate No. 008 (NIRB 2018, 2020). However, as noted in section 6.4 of Appendix 39, AEM last contributed to the collection of collar data in April 2018 through the deployment of 34 caribou collars (Page 6-2; AEM, 2024). Additionally, while the Proponent expresses a general intention to continue collaborating with the GN on this matter (Page 6-1; AEM, 2024), Appendix 39 lacks specific information about future collaboration, financial contributions, or in-kind support to the GN.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
Term and Condition 29 of Project Certificate No. 008 states that:	

The Proponent shall, in collaboration with the Government of Nunavut, collect additional caribou collar data and conduct analyses of this data to quantify the zone of influence and associated effects of project components on caribou movement for a study area that includes the Whale Tail mine site, the haul road, the Meadowbank Gold Mine and its All-Weather Access Road.

[Emphasis added by reviewer]

And that the objective of this term and condition is to:

To reduce uncertainty associated with the potential impacts of the Project, including the haul road, as well as of the Meadowbank Gold Mine and its All-Weather Access Road on caribou and thereby improve caribou protection measures. (NIRB 2018, 2020)

Pursuant to this term and condition, section 6.4 of Appendix 39 provides a summary of successfully deployed caribou collars since 2008 (Page 6-2; AEM, 2024). However, as indicated in this section, AEM has not deployed collars since April 2018; Instead, the GN has deployed collars in subsequent years (Page 6-2; AEM, 2024). Additionally, this section lacks any specific information regarding in-kind or financial contributions made by AEM in these subsequent years towards the collection of collar data.

Furthermore, section 6.1 of Appendix 39 states, “Agnico Eagle intends to continue collaboration with the GN DoE caribou satellite-collaring program that includes data collected within the Meadowbank Complex RSA” (Page 6-1; AEM, 2024). However, Appendix 39 does not elaborate on intended future collaboration or financial contributions to the GN pursuant to term and condition 29.

RECOMMENDATION(S)

The GN recommends the following regarding the above concerns:

- 1) In this and future reports, AEM should provide a table summarizing, by year since 2018, the in-kind versus financial contributions made by AEM towards the collection of collar data from the caribou herds that regularly interact with the Project (i.e., Wager Bay, Lorillard, and Ahiak).
- 2) In this and future reports, AEM should provide further details of plans to collaborate with the GN in the collection of collar data, including any planned investment of funds and in-kind resources, as well as a schedule of contributions.

GN AR # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Comparison of Road and Viewshed Surveys for Caribou
Terms and Conditions	29 (Project Certificate No. 008, Amendment No. 1)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meadowbank Division. Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7. (June 2019) • Agnico Eagle Mines Limited. Appendix 39, Parts 1–5, Agnico Eagle Mines Limited – Meadowbank Complex 2023 Wildlife Monitoring Summary Report Annual Report (March 2024)
IDENTIFICATION OF ISSUE	
<p>Section 17.3 of Appendix 39 presents a comparison of road and viewshed surveys for caribou concluding that the former were more likely to detect caribou and result in road closure mitigation. However, in comparing the effectiveness of these two methods for detecting caribou near the Project, the analysis does not account for differences in effort (i.e., time spent looking for caribou and number of observers).</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Section 17.3 Road and Viewshed Survey Comparison of Appendix 39 presents a comparison of road and viewshed surveys for caribou. AEM's conclusions of this comparison are:</p> <p><i>[o]verall, road surveys were conducted more frequently, were more likely to detect caribou, and were more likely to result in road closure mitigation, despite the lower average detection distance compared to viewshed surveys. It's possible that even if viewshed surveys have a further average detection distance that this does not necessarily mean that viewshed surveys have a higher probability of detection compared to road surveys. Road surveys have greater spatial coverage and had</i></p>	

a higher percentage of surveys with caribou detections compared to viewshed surveys. (Page 17-18; AEM, 2024)

However, the analysis presented in the report does not account for differences in survey length between the two methods (i.e., the amount of time spent looking for caribou or the number of observers). The methodology for viewshed surveys involves observers spending 10 minutes looking for wildlife at each viewpoint (Page 7-11, AEM, 2024). The length of road surveys is not specifically detailed in the report. However, Appendix 39 states that the survey vehicles move at a maximum speed of 30 km per hour (Page 3-1; AEM, 2024) and that the Whale Tail Haul Road (WTHR) is 64 km long (Page 1-3; AEM, 2024). Furthermore, the number of observers is for either survey type (i.e., road or viewshed) does not appear to be incorporated in the analysis presented in section 17.3 of Appendix 39.

RECOMMENDATION(S)

The GN recommends the following regarding the above concerns:

- 1) In this and future reports, AEM should provide an analysis of the road and viewshed survey comparison that adjusts for length of survey and number of observers, with an explicit consideration of survey effort.

GN AR # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Helicopter Traffic Monitoring and Reporting
Terms and Conditions	61 and 62(f) (Project Certificate No. 004, Amendment No. 002). 28 (Project Certificate No. 008, Amendment No. 001).
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited. Appendix 2, Whale Tail Update on Implementation of Commitments (March 2024). • Agnico Eagle Mines Limited. Appendix 39, Parts 1-5, Agnico Eagle Mines Limited - Meadowbank Complex 2023 Wildlife Monitoring Summary Report Annual Report (March 2024). • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mines Limited's Meadowbank Gold Mine Project and Whale Tail Pit Project 2019 Annual Report (June 2020). • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mine's Meadowbank and Whale Tail Project 2020 Annual Report (June 2021). • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mine's Meadowbank and Whale Tail Project 2021 Annual Report (June 2022). • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle's Meadowbank Complex 2022 Annual Report (June 2023). • Nunavut Impact Review Board. Project Certificate No. 004, Amendment No. 002 (August 2016). • Nunavut Impact Review Board. Project Certificate No. 008 (March 2018). • Nunavut Impact Review Board. Project Certificate No. 008, Amendment No. 001 (February 2020). • Nunavut Impact Review Board. 2019-2020 Annual Monitoring Report Meadowbank Gold Mine and Whale Tail Pit Projects

	<p>Agnico Eagle Mines Limited NIRB File Nos. 03MN107 & 16MN056 (December 2020)</p> <ul style="list-style-type: none"> Nunavut Impact Review Board. Exhibit No: 21 Agnico Eagle Terrestrial Environment Commitments. Public Hearing for Whale Tail Pit and Haul Road - Meadowbank Gold Project (September 2017)
IDENTIFICATION OF ISSUE	
<p>Aircraft activity, including helicopter flights, are recognized as a potential source of disturbance for a variety of wildlife. Appendix 39 illustrates improvements in the Proponent's helicopter reporting, which address many of the comments made by the GN in previous years (GN, 2020-2023).</p> <p>Despite these efforts, the GN maintains concerns regarding the potential impacts of flights operating below prescribed minimum altitudes (e.g., as detailed in Section 4.5.9 of Appendix 39). The GN requests that the Proponent provides additional justification for definitions concerning short-range and long-range flights, justification (as required by relevant laws and regulations where applicable) for the use of low-level flights for certain project activities (e.g., slinging) and ensure pilots provide an explanation for each low-level flight.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>During the NIRB's review of the Whale Tail Pit and Haul Road Project, the Proponent made the following commitments to the GN concerning helicopter traffic and monitoring:</p> <p><i>26. Helicopter – Distance buffers for caribou</i> <i>The Proponent shall apply mandatory, minimum distance buffers of 300m vertically and 1000m horizontally for the operational of all helicopters and fixed winged aircraft in proximity to caribou, subject to exception for safety considerations or the fulfillment of regulatory compliance activities only.</i></p> <p><i>27. Helicopter – Distance buffers for landing and take offs</i> <i>The Proponent shall apply the mandatory, minimum distance buffers to landings and take-offs of helicopters, such that engine starts and takeoffs are suspended when caribou are observed within the buffer distance.</i></p> <p><i>28. Helicopter – Monitor traffic</i> <i>The Proponent shall revise the Project's TEMP to include a program to monitor and report helicopter traffic associated with the Whale Tail project (including existing Meadowbank infrastructure) and all associated exploration activities so</i></p>	

that the spatial scale and intensity of this activity can be documented. This should include the collection and analysis of GPS track logs for all helicopter flights contracted by the Proponent. (NIRB, 2017)

Concerning the above, Term and Condition 28 of Project Certificate No. 008 of the Whale Tail Pit Project states:

The Proponent shall maintain a Terrestrial Ecosystem Management Plan (TEMP) throughout all phases of the Project. The Plan shall include detailed monitoring mitigation, and adaptive management measures for wildlife, with consideration for each Project activity predicted to affect wildlife, and with inclusion of specific triggers for mitigation and adaptive management intervention. The TEMP shall demonstrate consideration for all relevant commitments made by the Proponent throughout the Nunavut Impact Review Board's review of the Project... (NIRB, 2018)

In its review of the Project's annual report for 2019, the GN expressed concerns that the TEMP, despite the production of various drafts, had not been revised to include a helicopter monitoring program and that helicopter traffic was not being recorded in annual reports by the Proponent (GN, 2020). In December 2020, the NIRB directed the Proponent to work with the GN and the Terrestrial Advisory Group (TAG) as per Term and Condition 27 and 28 of the Project Certificate No. 008 to revise its TEMP (NIRB, 2020). The GN notes that in annual reports from 2020-2023, the Proponent has provided some of the information requested in the above commitments and the GN's past annual report comments concerning helicopter traffic (GN, 2020-2023). However, as indicated Appendix 2 – Whale Tail Update on Implementation of Commitments, the TEMP update is ongoing, and the Proponent has plans to submit this document in 2024 (Page 5).

Despite the absence of an updated TEMP which clearly outlines helicopter monitoring and reporting, the Proponent summarizes the specific flight restrictions pertaining to helicopters used in Project operations and activities in Section 4.5.9 of Appendix 39:

- *Long-range flights are a minimum of 650 m above ground level, except for take-off and landings.*
- *Short-range flights are a minimum of 300 m above ground level, except for take-off and landings.*
- *Notification of caribou, muskox or other wildlife sightings within 1 km of the helicopter pad.*
- *Caribou groups of 50 or more animals, and muskoxen of 10 or more animals must be avoided by a minimum of 1,000 m vertically and 1,500 m horizontally. Flocks of migratory birds must be avoided by 1,100 m vertically and 1,500 m horizontally. Flying over known raptor nests will be avoided.*
- *Harassing wildlife (flying below 300 m) is expressly forbidden unless animals pose an immediate danger to humans. (Page 82)*

Definition for Long-range and Short-range Flights

In the GN's previous annual report comment for the Project (GN, 2023), the GN noted that definitions for long-range or short-range flights were absent in the Project's 2022 reporting materials. As a result, the GN recommended that the Project's TAG should be engaged to develop the definition for long-range and short-range flights. Additionally, the GN recommended that short-range flights be defined as flights of 5 km or less (GN, 2023).

In Appendix 39, the Proponent has provided a definition for long-range and short-range flights, stating that:

...flights were classified as short- or long-range by calculating the maximum distance spanned during an individual flight leg...If this distance was <25 km, the flight was classified as short-range. Flights with longer flight spans were classified as long range... (Page 83)

As demonstrated above, the Proponent's implemented definition for short-range flights is significantly different from the GN's recommended definition. As such, the GN requests justification for the Proponent's use of <25 km as a threshold to define short-range flights. Additionally, the GN requests clarity on when the TAG was engaged to determine these definitions.

Justification for Flights below Mandatory Minimum Altitudes

Appendix 39 provides limited justification for flights occurring below the mandatory minimum altitudes:

...certain activities are required to be completed at lower altitudes than specified in the air traffic management plan. External load operations (equipment/material slinging), site inspections, reconnaissance and environmental surveys often require lower flight. Flights with these purposes have been considered permissible for low flight. Similarly, flights lower than 300 m have been considered permissible when flying low due to low visibility (poor weather conditions) or for emergency medevac services... (Page 82)

Generally, more justification for flying below mandatory minimum altitudes is required. In reporting helicopter traffic, AEM should distinguish between flights where low-level flying is required by law, regulations, safety, or the performance of environmental monitoring required under the Project Certificate versus flights where low level flying was the preferred means of flying (but not required by statute, regulation, or Project Certificate). For example, the Proponent characterizes external load operations (equipment/material slinging) as permissible for low-altitude flights. However, the Proponent does not reference specific law or regulations that illustrate the requirement for low-altitude flights with external loads.

Furthermore, the GN notes that some justification included in the annual flight records fails to provide sufficient context or clarity to the reader. For example, one flight leg (Flight Report Number 600303) states “Road Survey” as the justification for a flight with a mean height above ground of 157.4 m. No further context is provided in the annual flight record tables or in section 4.5.9. Additionally, “Environmental Survey” is used as the comment justification for 15 flight legs that occurred below the minimum height requirement. While it is likely that these environmental surveys correspond to the helicopter surveys conducted under the Arctic Raptor program (this program involved two helicopter surveys; 23–28 May and 09-12 August 2023; Appendix 39, Part 6), reference to the specific environmental program(s) these environmental surveys correspond to is not detailed within these above-mentioned tables or in section 4.5.9. Including this information in future reports would improve transparency for reviewers.

In addition to the limited justification for flights occurring below mandatory minimums, the GN is concerned with the occurrence of low flights that do not provide any justification for the purpose of low flights (recorded at the time of the flight). The GN acknowledges that pilots were instructed to begin adding comments to record the reason for low flights beginning on July 28, 2023 (Appendix 39, Part 2; Page 6). However, of the 294 short-range flight legs occurring after this period, 57.1% operated below the minimum height requirement (300 m above ground), without documentation of the purpose of low flight. The mean height above ground for short-range flight legs during this period ranged from 34.1–299.6 m. Additionally, of the 81 long-range flight legs occurring after this period, 58% operated below the minimum height requirement (650 m above ground), without documentation of the purpose of low flight. The mean height above ground for long-range flight legs during this period ranged from 109–454.1m.

Missing or Unclear Data

The GN identified approximately 29 short-range flight legs (23 for slinging and 6 for Passenger), in the data provided where the Proponent did not provide a value for mean height above ground. Instead, the text “full flight too low to distinguish from takeoff/landing,” was provided.

Additionally, the GN notes that one flight leg (Flight Report Number 321928) that occurred on April 10, 2023, lists “Wildlife” as both a Flight Code and Flight Type. This flight leg, while not occurring below the minimum height requirement, lists “Environmental Survey” as the justification for a low flight. Based on the materials reviewed, the wildlife survey associated with this flight leg was unclear.

RECOMMENDATION(S)

The GN recommends the following regarding the above concerns:

1. Provide justification for the Proponent's implemented definition for short-range flights as it significantly differs from the GN's recommended definition.
2. Provide clarity on how the TAG was engaged to determine the definitions of long-range and short-range flights.
3. Ensure that pilots provide justification for all low-level flights at their occurrence so that this information is included in annual report tables (e.g., information in "Comment Justification for Low Flight") to minimize data gaps.
4. Cite any relevant laws, regulations or project monitoring requirements for flight legs occurring below minimum flight altitude, with specific attention to external load operations (equipment/material slinging).
5. Ensure that numerical data, detailing the mean height above ground, is provided for each flight leg.
6. Ensure that any flights that occur for the purpose of environmental surveys are clearly linked to their specific research program.

GN AR # 05	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Spills Reporting – Coolants
Terms and Conditions	26 (Project Certificate No. 004, Amendment No. 001).
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited: Meadowbank Complex. Meadowbank Complex 2023 Annual Report 61-000-100-REP-006. (March 2024) • Government of Nunavut, Department of Environment, Environmental Protection Division. Environmental Guideline: General Management of Special and Hazardous Waste. (March 2023) https://www.gov.nu.ca/sites/default/files/publications/2024-05/Hazardous%20Waste%202023-03.pdf
IDENTIFICATION OF ISSUE	
<p>The GN appreciates the Proponent's efforts to include detailed information on all spills in Section 7. Spill Management, of the Meadowbank Complex 2023 Annual Report (Annual Report) (AEM, 2024). However, tables 7-3–7-5 indicated several spills involved an unspecified “coolant” by the Proponent. In the absence of information about the specific type of coolant(s) involved, the GN wishes to note that some coolants, particularly ethylene glycol, can be highly toxic and attractive to wildlife. As such, spills of ethylene glycol can pose a risk to wildlife that come into contact with contaminated soil or water.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Section 7. Spill Management of the Annual Report (AEM, 2024) provides information regarding all reportable spills and non-reportable spills that occurred at the Meadowbank Site and Whale Tail Site in 2023. This section of the Annual Report indicates that 37 reportable spills occurred in 2023 and that these spills were reported to the GN;</p>	

additionally, this section indicates that 151 non-reportable spills occurred in 2023. Summary details for both spill types (i.e., reportable and non-reportable) are provided in tables 7-2–7-5 of the Annual Report.

While the GN appreciates the Proponent's efforts to include detailed information on all spills in annual reports, the GN notes that tables 7-3–7-5 indicated several spills involved and unspecified coolant by the Proponent. In the absence of information about the specific type of coolant(s) involved, the GN wishes to note that some coolants, particularly ethylene glycol, can be highly toxic and attractive to wildlife (GN, 2023).

RECOMMENDATION(S)

The GN recommends the following regarding the above concerns:

- 1) In this and future annual reports, the Proponent specify the type of coolant(s) involved in Project activities and spills.
- 2) If and where applicable to this Project, the GN recommends using less toxic propylene glycol instead of ethylene glycol.

GN AR # 06	
Department	Economic Development and Transportations
Organization	Government of Nunavut
Subject/Topic	Comment 1: Gender analysis of Meadowbank and Whale Tail 2023 <i>Annual Report</i>
References	<p>Appendix 47, Kivalliq Projects 2023 Socio-Economic Monitoring Program Report</p> <p>Aglu Consulting Ltd. (2023), Barrier to Employment of Inuit Women, Interim Report</p> <p>Inuit Workforce Barriers Strategy (IWBS) Study</p>
SUMMARY OF COMPLIANCE	
<p>Appendix 47, Kivalliq Project 2023 Socio-Economic Monitoring Program Report, contains a gender analysis of the mine's employees. In response to this study's findings, the Proponent indicated that it has developed and implemented strategies and programs intended to increase the percentage of female employees at the mine.</p>	
REVIEWER'S COMMENTS AND SUPPORTING RATIONALE	
<p>Several gender specific barriers identified in the report, such as sexual behaviour, sexual harassment, pregnancy, are linked to family-community-workplace interaction (organizational) (1). In 2018, an Inuit Workforce Barriers Strategy (IWBS) Study identified many of these barriers.</p> <p>While many of the barriers identified in the study "<i>Barrier to Employment of Inuit Women</i>" were examined in the context of whole group of young workers, the report states that largely young workers with young families face significant challenges adhering to rotational work schedules when combined with a severe shortage of daycare options. Inference can be made that a large percentage of the young-worker group facing this type of challenges are likely females.</p> <p>According to the latest StatsCan census (2021), the growth rate for females in Nunavut is faster than that of males, and different studies have demonstrated that women's participation in Canada's economy is also increasing. So, implementing effective strategies to fight the barriers women face at work will positively impact the Inuit employment rate and their contribution to the local economy.</p>	

Unfortunately, Appendix 47, 2023 Annual Report, page 23, showed that female employees working directly for Agnico Eagle, and contractors decreased at Meadowbank/Whale Tail. At the same time, the report notes that AEM has designed and implemented different programs¹, intended to increase the female employment rate at the mine.

REVIEWER'S RECOMMENDATIONS

Given that those programs seem to have had less than consistent impact on increasing the female employment rate at the mine thus far, can AEM comment on any modifications it is contemplating for the programs and/or follow-up initiatives it intends to implement in both the short-term and long-term to increase the employment rate of females at the mine?

¹ Civility at Workplace Program, International Women in Resource Mentoring Program (IWRMP), Maternity Leave Program.

GN AR # 07	
Department	Economic Development and Transportations
Organization	Government of Nunavut
Subject/Topic	Comment 2: Employment and Turnover analysis of Meadowbank and Whale Tail <i>2023 Annual Report</i>
References	<p>Appendix 47, Kivalliq Projects 2023 Socio-Economic Monitoring Program Report</p> <p>Vanclay F. (2003). International Principles for Social Impact Assessment</p> <p>Inuit Workforce Barriers Strategy (IWBS) Study</p>
SUMMARY OF COMPLIANCE	
Appendix 47 data related to employment shows an overall fluctuation in Inuit employment, and high turnover rate among the Inuit employees at the mine.	
REVIEWER'S COMMENTS AND SUPPORTING RATIONALE	
<p>EDT has concerns about the trends observed for the following employment-related indicators: Inuit employment rate, Full-Time Equivalent (FTE) and Resignation/Voluntary termination at both sites.</p> <p>Appendix 47 (page 9), "Kivalliq Projects 2023 Socio-Economic Monitoring Program Report," mention a 13% decline in Inuit employment rate at Meadowbank and Whale Tale compared to the previous year.</p> <p>Page 14, Appendix 47, Meadowbank / Whale Tail, shows that Inuit full-time Equivalent (FTE) comprised 16% of the total employee base in 2023, down from 18% in 2022. For contractors, Inuit FTEs were at 3% of total FTEs in 2022 and 2023, respectively.</p> <p>Resignation / Voluntary termination rate for Inuit employees over the years has always been higher than that of non-Inuit employees. In 2019 Resignation / Voluntary Termination were 77 out of 145 and in 2023 the number of Resignation / Voluntary Termination was 53 out of a total of 77². Note that the percentage of Resignation / Voluntary Termination represents a higher percentage now than in 2019.</p>	

² AEM has listed the following reason why employees left their position: Resignation / Voluntary Termination, Dismissal, End of Contract, Permanent disability/ Deceasing, Compagnie Reorganization, Retirement, Other

The above-mentioned trends for the indicators above are consistent for the years as illustrated on Chart 8, Appendix 47 (page 20), despite different training or programs AEM developed to support Inuit employment.

REVIEWER'S RECOMMENDATIONS

Given the current strategy implemented to support Inuit employment, can AEM provide an assessment of whether the strategy is working as intended?
When graphs for Meadowbank, Whale Tail, and Meliadine are superimposed, 2020 showed a decline in Inuit employee turnover rate on these mines. Can AEM explain the reasons behind this simultaneous change at all its Kivalliq sites?

APPENDIX A

Figure 6: Thresholds for Monitoring and Mitigation of Caribou in Proximity to Mine Operations

