



2. Disagreement with the Annual Report conclusion

The 2023 Annual Report includes the wildlife survey and incidental sightings (App. 25, S. 9.0, Table 8) for the 5 years previous to 2023 which is potentially useful. But Agnico Eagle does not comment on any trends in sightings or provide insight into how its monitoring could be coordinated with other monitoring initiatives.

3. Reasons for disagreement with the Annual Report conclusion

Although the numbers do not include any measure of survey effort, they likely capture broad trends. There was no cross-reference to the similar trends for foxes and hares detected on the remote cameras (App.25, App. G, Table 6.2.1).

The trends include wildlife likely to fluctuate or cycle in number (Arctic Fox, Arctic Hare and Ptarmigan). Agnico Eagle relies on tables but in some cases, graphs may draw the reader’s attention to the trends (Figure 1). The trends are likely predictive for monitoring and mitigation. For example, if the sightings of Arctic foxes peaked in 2022, then it is uncertain whether the increased mitigation in 2023 (App. 25, S. 9.5.2) was effective or that there were fewer foxes. The increasing trend in raven sightings (App. 25, S. 9.0, Table 8) may reflect an increase in scavenging opportunities. Consideration could also be given to whether the trends include those species which are peregrine prey as peregrine nesting in 2023 was declining (App. 25, S.85).

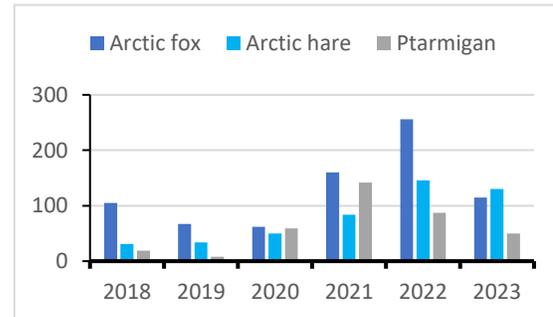


Figure 1. Wildlife survey and incidental sightings based on 2023 Annual Report (App. 25, S.9.0 Table 8).

T&C 45 states that “The Proponent shall demonstrate consideration for cooperating with existing and planned regional and/or community-based monitoring initiatives associated with terrestrial wildlife and wildlife habitat . . .”.

for example, the Nunavut General Monitoring Plan. The 2023 Annual Report does not describe whether there was cooperation with NGMP or other monitoring initiatives. The possible trends would also be an opportunity to ask Inuit elders about changes in numbers and how the mine may be contributing to ecological changes.

Conclusion/Request 24.03



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| Comment No. KivIA 8: |
| References: App. 25, S. 4.0 Environmental variables T&C 56e |
| <p>1. Gap/Issue</p> <p>The 2023 Annual Report has a brief reporting of annual environmental conditions including timing of snowmelt, green-up for 2023 as required in T&C 56e but not with reference to previous years.</p> <p>2. Disagreement with the Annual Report conclusion</p> <p>The KivIA suggests that the trends of annual environmental conditions are part of an assessment and are an essential context for describing monitoring and mitigation.</p> <p>3. Reasons for disagreement with the Annual Report conclusion</p> <p>The 2023 Annual Report (App. 25, S.4.0) only reports the bare minimum for environmental variables. However, knowing trends and annual variability is essential to support separating environmental effects from project impacts. For example, the shift in calving is likely related to trends in the timing of plant green up and baseline information is available³; comparing the annual green-up timing relative to previous years could contribute to understanding caribou local distribution. During the public hearings for the Meliadine Extension Project, there was discussion about whether caribou had abandoned the traditional crossing west of the mine site in response to mine activities or the timing of lake ice break-up. This suggests that more information such as the timing of Meliadine Lake break-up as well as the date of snowmelt (App. 25, S. 4.0) would be useful.</p> <p>The significance of describing the minimum temperatures (App. 25, S. 4.0) is not explained; more useful would be, for example, the number of hot days (>20°C) which is relevant to caribou behavior and movements. The temperature, wind speeds and directions are included in the behavioral monitoring (App. 25, App. F; App. B). Although, they did not show as significant variables, most of the behavior scans were earlier in summer before the mosquito season and hot weather (App. 25, App. F, S. 6.3.4).</p> |

³ Mallory CD, Williamson SN, Campbell MW, Boyce MS. 2020. Response of barren-ground caribou to advancing spring phenology. *Oecologia* 192: 837-852.

