



protect GN's intellectual property rights over the data, the data's integrity and the data's public representation. The latter concern is of particular interest to the GN, as caribou management and research could not occur without strong relationships with stakeholders across the Territory. Any GN research program is required to, in all phases, involve Regional Wildlife Organizations (RWO), and community-based Hunters and Trappers Organizations/Associations (HTO/A), to the extent possible. The relationships the GN's Wildlife Research Division maintains with RWOs, HTO/As, and other research partners, must be respected and maintained for the research to continue. This ensures the inclusion of Inuit Qaujimaqatuqangit and ensures any study results are properly discussed and reviewed prior to reporting back to the public in a transparent and unbiased manner. A DSSA is necessary prior to the release of raw data and for publication to protect these relationships.

Based upon concerns with the standard form DSSA the GN used when providing raw telemetry data in the past, the GN has undertaken to revise and update its standard form DSSA. This update will address concerns raised by research, community, and industry stakeholders. This should streamline the process of entering into new long-term agreements. The GN is hopeful the changes will be amenable to AEM and KIA and indefinite DSSAs will be entered into in the coming months. The GN is also willing to provide the data necessary, through temporary DSSAs using the existing template. As an example, data was recently provided to KIA following their agreement to a DSSA in December 2021. This could reassure the NIRB that 2020 lessons are incorporated into the 2021 monitoring year until a new DSSA is reached.

Simple telemetry data, in the form of maps produced and provided by professional Geographic Information Systems consultants contracted by the GN, remains available to AEM to ensure proper mitigation can be followed. The GN is of the position that this is of sufficient quantity and quality to fulfill the basic monitoring and mitigation requirements of the Terrestrial Ecosystem Management Plan (TEMP). Daily (or less frequently when caribou are not present) maps are provided to AEM (and KIA) to fulfill their obligations under Project Certificates No. 004 and 008 and the TEMP. That is, caribou protection measures along the all-weather-access road and Whale Tail haul road. These maps show where and when caribou are located relative to the Project roads and infrastructure. The maps indications of caribou approaching the Project and serve as advance notice for the TEMP's caribou protection measures to be implemented. This simple mapped telemetry data of the regional study area with collar locations and tracks displayed (see Appendix 1), is provided at no charge but at an estimated cost of \$40,000 annually to the GN.

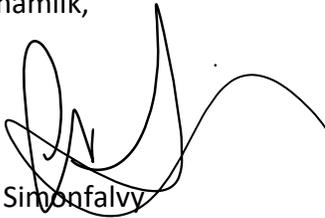
Raw caribou telemetry data for the purposes of assessing of potential impacts of the Meadowbank and Whale Tail Projects is also available to AEM through a DSSA. The GN asserts that this raw data is not being withheld from AEM, but rather must be obtained through agreement with the GN's conditions. On October 27, 2020, a request for raw data access from

AEM was received by the GN. While the GN endeavoured to accommodate AEM's request and provide the data in a timely manner, unfortunately, there were unforeseen delays. As well as these delays, there was a breakdown in negotiations and an agreement was not reached. Without a DSSA in place the raw data was not released to AEM. Though the GN's simple mapped caribou telemetry data was and is continually provided to AEM.

The GN is always willing to work with industry to improve upon caribou protection measures. At the request of AEM, the GN has agreed to convert its entire collar inventory to telemetry units with geofencing capabilities. The geofence utility is a pre-programmed barrier that allows the user to be notified whenever the collared animal crosses a defined geofence. This is not a research requirement or objective of the GN, nor of the GN's community and research partners. This effort requires the retirement of 124 existing collars, and their replacement carries a significant cost to the GN (approximately \$370 000). The conversion of units has been delayed due to pandemic related program cancellations, with expected completion by 2025.

The GN would like to reassure NIRB and all parties that it is currently providing simple mapped caribou telemetry data and will continue working towards raw telemetry data being provided to AEM and KIA in a manner that is agreeable to all parties. Raw telemetry data will remain available through temporary agreements under the existing DSSA template, while the GN works with its counterparties on longer term agreements. The GN appreciates this opportunity and consideration to provide an update and address the Board's concerns. Should you have any further questions or concerns, please contact me by phone at (867) 975-7828 or by email at [asimonfalvy@gov.nu.ca](mailto:asimonfalvy@gov.nu.ca).

Qujannamiik,

A handwritten signature in black ink, appearing to be 'AS' with a large flourish extending to the right.

Agnes Simonfalvy  
Avatiliriniq Coordinator  
Government of Nunavut

Cc. Jamie Quesnel, Agnico Eagle Mines Limited

# Appendix 1

