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Cambridge Bay
Ikaluktutiak

Gjoa Haven
Okhoktok

Taloyoak

Kugaaruk

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

July 4th, 2023

**Re: Review of AEM's 2022 Annual report for Hope Bay Project Certificate
NIRB No. 009.**

Dear Kelli Gillard, the KIA has reviewed AEM's 2022 Annual Report for the Hope Bay project to the NIRB.

1) Compliance Monitoring:

The KIA's Framework Agreement (FA) and Inuit Impact and Benefits Agreement (IIBA) with Agnico Eagle Mines Limited (AEM). the cover terms and conditions of NIRB Project Certificate 009 and the NWB Type A water licenses.

The Framework Agreement is a confidential agreement between KIA and AEM that supersedes and replaces all previous contractual arrangements between both parties. Section 3.1 of the FA covers Terms and conditions of land use license and reporting.

Appendix A of Section 3.1 of the Framework Agreement specifies the details of annual reporting by AEM to the KIA, which is summarized as follows:

AEM is to provide an annual report to KIA providing details of its operations under any land use License, Advanced Exploration Lease and/or Commercial Lease covering the location and operations area of lands affected, and the nature of facilities and equipment at these sites. In addition, AEM is to provide details of progressive reclamation or closure activities undertaken during the year and details of all permits, licenses, and authorizations from other regulatory bodies or agencies that are required for operations.

This annual report is to provide information on:

- Ground disturbances including land use activities for camps, infrastructure, equipment, winter roads and trails.
- Fuel and Chemical storage including Chemicals of Potential Concern inventory (COPC), fuel and chemical usage, and spill records.
- Drilling programs, locations, and methods.
- Water use and effects on water.



- Wildlife interaction, data logs, and summaries.
- Waste disposal, waste management practices, inventory of waste on site, and inventory of hazardous materials or non-combustible waste removed from site.
- Closure and reclamation progress associated with waste management, drilling, and ground disturbance along with associated costs.
- General information on annual inspection activities by staff and other agencies and their results, community consultations, future exploration work plans, submissions to NIRB, NWB, or NPC or other regulators related to mining activity, archaeological sites and burial grounds, and any incidents of storage or possession of alcohol and drugs on site.

AEM has provided the KIA with the **Hope Bay Project 2022 Annual Report for KIA Framework Agreement** in accordance with Appendix A to Schedule 3.1 of the Framework Agreement. This report is separate from the **Hope Bay Project 2022 Annual Report to the NIRB**.

The socio-economic impact of the project on affected communities of Nunavut is covered by the IIBA, which is summarized here.

Inuit Impact and Benefits Agreement (IIBA) – Summary.

The Hope Bay Project went into Care and Maintenance in March 2022. During Care and Maintenance, Schedule “D” Training and Education Opportunities and Schedule “E” Employment do not apply. All the other Schedules still apply, including Schedule “A” Implementation Committee. Instead of four Implementation Committee meetings annually, there must be at least one meeting annually.

A summary of 2021 Hope Bay Project IIBA implementation results was provided in the September and October 2021 IIBA Manager Reports to the KIA Board. This included a comprehensive review of Inuit employment at the Hope Bay Project since 2015. In May 2022, AEM provided general information to the KIA regarding upcoming Inuit hiring and employment, as follows. The GN Health officials determined that there is no need for a Return-to-Work protocol now that Nunavut COVID restrictions have been eased. AEM has decided to maintain their pandemic procedures to manage COVID-related risk. Pre-employment medical testing will be conducted in Cambridge Bay. COVID testing will be conducted in Yellowknife, with in-person assistance from Cambridge Bay staff for accommodations and testing.

The Inuit Environmental Advisory Committee had an informal meeting on March 24, 2022. The purpose of the meeting was to provide a general update and to introduce committee members to AEM’s Environmental Superintendent, of the Hope Bay Division. The environmental monitoring program at the Hope Bay Project site and the fisheries offsetting program near Cambridge Bay will continue as planned regardless of the Project going into Care and Maintenance.



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At this meeting, the committee discussed creating winter road crossings so that people travelling by snow machine will be able to cross the plowed snowbanks that are found along the Project roads. The committee members were asked about a ceremony being held to put up a commemorative plaque for the person who passed away in the helicopter accident on September 14, 2021. The committee agreed with this idea. With regards to employment, it was mentioned that there will be no pre-employment drug testing and no criminal record checks except in the case of candidates applying for sensitive positions. Hiring is also expected to be faster, possibly taking less than 3 weeks.

The Inuit Environmental Advisory Committee (IEAC) held a formal meeting on August 3rd and 4th, 2022. They discussed proposed fisheries offsetting plan, Roberts Lake Outflow monitoring, Cambridge Bay proposed offsetting measures, and marine infrastructure updates.

The IEAC toured the fish fence of the fisheries offsetting work at Roberts Bay outflow and flew over the marine shoals and jetty in Roberts Bay on August 3rd.

The IEAC toured site facilities including the waste management area, water treatment plant, Tailings Impoundment Area (TIA), developments in the Madrid Area, and the remediated Windy Camp on August 4th. The IEAC also stopped at potential locations for height of land surveys to discuss methods.

Internal Report on September Hope Bay Inspection – July 19 to 21, 2022

Summary

The inspection of the Hope Bay mine site and facilities was conducted from July 19th to 21st as per established inspection schedule. Guy Dufour of Agnico Eagle Mines LTD. (AEM-TMAC) had accompanied John Roesch and Skye Lacroix of KIA on the inspection. Sixty-two (62) site components out of 117 components were inspected in accordance with KIA's established schedule.

Overall, the mine site is being maintained in good condition while in care and maintenance. Roberts Bay, the Airstrip and Access Road, Doris North, Waste Management Area, Quarry #2, Secondary Road, the TIA area, Windy Road and Windy Lake Camp, and Madrid North were inspected. On-going exploration is being done at Doris North. Boston Camp is being refurbished and cleaned up for use in exploration activities.

The waste management area has been cleared out. Waste material is sorted, segregated, and stored in C-cans to be backhauled from site. In 2021, 475 C-Cans or



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material was backhauled from site. 250 of these 475 C-Cans (53%) were scrap metal for recycling.

The jetty is in very good condition and well maintained. AEM is considering expansion of the jetty to accommodate the off-loading of cargo by barge and to fore go the construction of the Marine Cargo Dock and road. AEM is currently weighting its options and has not decided on this.

The Roberts Bay discharge pipe is in good condition and the diffuser will be reinstalled at the end of July. The airstrip is in good condition and will be extended by 300 metres for improved safety. AEM has expanded the core storage pad for new core storage at Quarry 2.

The Crushing and Milling Plant is shut down and no maintenance is being conducted. The tarp covering the Primary Jaw Crusher is shredded and needs to be replaced.

The North Dam is in good condition with no cracking at the crest or water leakage at it toe. AEM is planning on building an overflow spill way to improve safety. A temporary bladder and access road has been installed to segregate TIA water and mine water. Tailing are being pushed to the side for use in the construction of the interim dyke.

Extensive remediation has occurred at Windy Camp with most of the buildings gone. The tent frame Quonsets are to be removed this summer. A pad was constructed for the relocation of the water pump. The water pump is to be housed with the generator in an enclosed building. The generators waste heat will be used to heat the building.

Complete revegetation has occurred in the vegetation dieback zones at Boston Camp. There is also significant vegetation regrowth at the Orbit 25 brine spill burn.

Compliance Status

2) Effects of Monitoring:

a) Whether the conclusions reached by AEM in the Hope Bay 2022 Annual Report to the NIRB are Valid.

KIA's consultants in the areas of wildlife, aquatic sciences, and geotechnical engineering reviewed the Hope Bay 2022 Annual Report to the NIRB and the following documents:



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- Appendix A. Concordance Table.
- Appendix B. Site Layouts.
- Appendix C. Status Update and Project Certificate Commitments.
- Appendix D. Compliance Monitoring Reports.
 - Appendix D-1. Q1-Q3 2021 Atmospheric Compliance Monitoring Program Report-Doris and Madrid Mines, Hope Bay Project.
 - Appendix D-2. 2022 Waste Rock, Quarry and Tailings Monitoring Report, Doris and Madrid Mines, Hope Bay Project.
 - Appendix D-3. Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Plan Compliance Report.
 - Appendix D-4. Hope Bay Project: 2022 Aquatic Effects Monitoring Program Report.
 - Appendix D-5. 2022 Waste Rock and Ore Monitoring Report, Boston Camp.
- Appendix E. 2022 Inuit Environmental Advisory Committee Meetings.
- Appendix F. 2022 Hope Bay Project – Effluent Monitoring Reports.
- Appendix G. 2022 Hope Bay Mine Phase 1 Environmental Effects Monitoring Interpretive Report.
- OM&S Manual: Hope Bay Doris Tailings Impoundment Area-Revisions 6 (AEM, March 2023c).
- Project Certificate 003 Terms & Conditions and Appendix A commitments.
- Project Certificate 009 Terms & Conditions and Appendix B commitments.
- Hope Bay Socio-economic Monitoring Report.

Overall, most of our consultants find AEM's conclusions in the 2022 Annual Report are basically valid, with partial and complete agreement on several project Terms and Condition, and commitments.

AEM has presented adequate information to demonstrate the Hope Bay Project has complied with project certificate terms and conditions to most of our consultants, whereas KIA's wildlife consultant considers several project certificate conditions to be only partially compliant.

Our wildlife consultants comments and recommendations concerning these project certificate conditions will be presented along with our other consultants in the next section of our response to NIRB.

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



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Hope Bay 2022 Annual Report to NIRB

KIA-NIRB-01

Review Comment Number	KIA-NIRB-01
Subject/Topic	Diversion of organic waste to a composter
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> Section 3.1.1 <p>Agnico Eagle, Hope Bay Project, Incinerator and Composter Waste Management Plan (March 2023)</p> <ul style="list-style-type: none"> Sections 2.1.1.1, 2.1.3, 2.2, 2.2.3, 2.2.6, 2.2.8 Modules A-E <p>Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> Section 1.3, Table 1.3-1; Section 2.8 <p>TMAC Resources, Hope Bay Project Incinerator Management Plan (December 2017)</p> <p>TMAC Resources, Hope Bay Project Non-Hazardous Waste Management Plan (December 2017)</p> <ul style="list-style-type: none"> Table 4.1 <p>NIRB, Letter Re: Composter, Acknowledgement Regarding Agnico Eagle Mines Limited's Composter Modification at the Hope Bay Project (May 10, 2023)</p>
Summary	<p>The KIA is concerned that the proposed composter will increase attraction of scavenging wildlife species, such as grizzly bear and furbearers. The increased presence and potential habituation of these animals may lead to increased human-wildlife interactions and incidents, as well as the need for the habituated animals to be terminated. A change from incinerating all food wastes to composting could be substantial for wildlife attraction and may also be non-compliant with the terms of the Project's Type A Water Licence. Agnico needs to plan for and implement additional management measures for the composter to mitigate wildlife attraction, monitor the effectiveness of these measures, and apply adaptive management, including identifying when it is necessary to continue/revert to incineration.</p>
Detailed Review Comment	<p>In the Summary of Project Activities in 2022, Agnico states that construction and operations at Doris included beginning to relocate and erect a dome to house a composter in the area of quarry 2 (Section 3.1.1). Agnico also updated their Incineration Management Plan in March 2023 to include composter waste</p>



	<p>management. The KIA understands that the NIRB determined that the Composter Modification would not change impacts to wildlife (among other potential impacts) and does not require an amendment to the existing water licence, does not meet criteria for significance as set out in the Nunavut Planning and Project Assessment Act (NuPPAA), and does not require further assessment by the NIRB (letter dated May 10, 2023). However, we have some concerns about the proposed composter and potential effects on wildlife.</p> <p>It is unclear if and how thoroughly Agnico considered potential wildlife attraction to the composter. Since the latest Wildlife Mitigation and Monitoring Plan (WMMP) was updated in January 2023, it does not contain mitigation and monitoring for the composter. The WMMP, Table 1.3-1, still references the Incinerator Management Plan (2019) and Non-hazardous Waste Management Plan (2017), both of which are intended to ensure that potential attractants are appropriately managed and food waste is safely stored and incinerated. These measures are reiterated in Section 2.8 (Infrastructure and Waste Management) of the WMMP.</p> <p>The 2023 Incinerator and Composter Waste Management Plan (ICWMP) itself contains conflicting details about how food waste will be managed. In the Plain Language Overview, Agnico states that “This Plan ensures that... 2) animal attractants are promptly incinerated...” The addition of a composter to manage “organic matter including food (e.g., coffee grounds and tea bags, eggs and eggshells, fruit and vegetable peelings, meat, chicken and fish including bones, nut shells, pasta, ice, sauces and gravy, solid dairy products, table scraps and plate scraping, etc.)” and small dead animals (Section 2.1.1.1) suggests that Agnico is non-compliant with their own policy.</p> <p>Section 2.1.3 (Prevention of Wildlife Attraction) states that “Agnico Eagle is required by the Water Licence and Project Certificate to manage food wastes to prevent attraction of wildlife, and if necessary, incinerate food wastes... Collection and transfer of food wastes is performed so that these attractants are stored safely, moved between facilities securely, segregated and sent for composting and as a last resort, to reduce wildlife attraction, are burned in the incinerator promptly.” The reviewer could not find the 2019 version of the Incinerator Management Plan on the NIRB registry; however, it is apparent in the 2017 version that the “if necessary” and “as a last resort” language regarding incineration was not previously included. The Conformity Tables in Module A: Doris, Module B: Windy, Module C: Madrid, and Module D: Boston still reference Type A water licence (2AM-DOH1335) language such as, “The Licensee shall dispose of all food Waste in an incinerator</p>
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	<p>designed for this purpose...” Has the Nunavut Water Board (NWB) agreed to amend the wording of these terms?</p> <p>In Section 2.2 of the ICWMP, Agnico states that “The composter will be housed where waste management activities (i.e., the incinerator) are already conducted, and within the approved mine footprint.” It is unclear if Agnico considers this siting to be a measure to manage wildlife attractants (i.e., one source location rather than multiple). However, the KIA notes that food waste and general kitchen refuse are/were incinerated daily (Table 4.1 in the 2017 Non-Hazardous Waste Management Plan), while the composting process takes a minimum of nine days (Section 2.2.6 in the ICWMP). Daily incineration was highly recommended to minimize the amount of time that potential attractants would be present on site.</p> <p>Agnico discusses Odour and Dust Control in Section 2.2.8, stating that “Odours during the operation of the equipment is mitigated by sweeping the floor, cleaning up any organic matter debris on or around the composter, and removing any material that has fallen on the floor. Careful monitoring of the composting process... will aid in avoiding the generation of odours. The monitoring of humidity is an important factor in controlling odours from the composting process.” There is no mention of wildlife effects/attraction in this section about odours. The KIA notes that the Brome Composter Operating Manual (Version 2019) in Module E of the ICWMP, from which Agnico pulled odour management measures, focuses on how “to maintain a good impression of your composting installation and to avoid disagreements with your neighbours.” These ‘urban’ measures may be insufficient to mitigate attraction of wildlife such as grizzly bear, which may be able to smell odours up to 30 km away. Note that the Brome Composter Operating Manual, Section 4.5, also suggests installation of an odour dispersion or treatment system (e.g., fume hood) for odour management, which Agnico does not appear to have considered. If they do plan to install such a system, that should be included in their plan explicitly.</p> <p>Finally, Agnico states in Section 2.2.3 (Composter Description and Installation) that “Collected compostable waste are stored in dedicated waste containers, located throughout the Hope Bay Mine where organic material may be produced.” It is unclear if these dedicated waste containers are new for composting, or if they already existed for incineration purposes. Clarification is needed regarding the locations of these containers; it would be prudent to restrict them to the kitchen facilities such that potential wildlife attractants are not distributed “throughout the mine”.</p>
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	<p>Ultimately, the KIA is concerned that the proposed composter and storage of materials for incineration throughout the Hope Bay mine will increase attraction of scavenging wildlife species, such as grizzly bear, wolverine, foxes, and wolf, to the Project site. The increased presence and potential habituation of these animals may also lead to human safety concerns and increased human-wildlife interactions, incidents, and wildlife terminations. Agnico's policy and protocol changes from incinerating all food wastes to composting could be substantial for wildlife attraction. It is crucial that Agnico plan for and implement additional management measures for the composter to mitigate wildlife attraction, monitor the effectiveness of these measures, and apply adaptive management, including identifying when it is necessary to continue/revert to incineration. The WMMP should be updated to include the composter as soon as possible and prior to composter installation and operation. The details of the composting plan should also be provided to the KIA for review.</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please clarify if potential attraction of wildlife to the composter was considered in this modification proposal. For example, has Agnico studied the potential effects of keeping organic material on site for 9 days (composting process) vs. 1 day (incineration schedule) within the containers planned to store compostables? • Please describe the composter design (e.g., inclusion of an odour dispersion or treatment system), management measures, and monitoring program that will be applied to mitigate wildlife attraction to the composter. These details must be included in the next iteration of the Hope Bay WMMP. • Please clarify if dedicated waste containers for organic material will be restricted to the kitchen facilities (or as per the current management and safe storage of food waste prior to incineration, which appears to be effective in mitigating wildlife attraction).
Importance	High

KIA-NIRB-02

Review Comment Number	KIA-NIRB-02
Subject/Topic	Details of spill events and follow-up activities
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> • Section 7.2, Table 7.2-1



	<p>Agnico Eagle, Hope Bay Project, Quarry Management Plan (September 2022)</p> <ul style="list-style-type: none"> Section 2.2.4
Summary	<p>In 2022, there were two reportable spills of underground contact water within two weeks of each other. It is unclear whether any of the corrective actions identified after the first incident were implemented, which may have prevented (or reduced the severity of) the second incident. Another reportable spill involved discharging water that did not meet conductivity criteria. Water testing/monitoring procedures should be modified to wait for accredited lab results before proceeding.</p>
Detailed Review Comment	<p>There were six reportable spills in 2022, summarized in Table 7.2-1. Two incidents involve underground contact water that occurred within two weeks of each other on May 30 (33 m3) and June 16, 2022 (500 L). The corrective actions and follow-up activities noted for both events are similar and include:</p> <ul style="list-style-type: none"> A one-page summary of the WTP operations, environmental obligations, UG production needs and operator contact information is to be produced, aiming at improving communication between underground and surface departments. Installation of visual high alarm on the outside of the water treatment plant. The event and the results of the investigation have been communicated to the various underground and surface teams involved in their daily toolbox meetings, and the cross-shift will be informed by e-mail by the underground supervisor. <p>It is therefore unclear if the corrective actions were immediately implemented after the May 30 spill event or if there was a delay that prevented some/all corrective actions to be implemented until after the June 16 spill event (e.g., procurement of a visual high-level alarm?). Given that the incident investigation on July 11, 2022 determined the root cause to be “A lack of communication between the UG rotation shifts, coupled with an equipment failure, lead to the tank overflowing and causing the spill”, it appears that the corrective actions to improve communication may not have been applied (or not completely understood) after the May 30 spill event. The dates indicated for when a follow-up report was provided to an Inspector are also confusing because Agnico lists June 13, 2022 for the May 30 spill event and June 12, 2022 for the June 16 event. The latter is not possible as reporting would need to have occurred before the incident; and neither date would include the results of the July 11, 2022 investigation, which presumably</p>



	<p>involved both spill events (though this is unclear). It is important that corrective actions be undertaken as soon as possible to prevent recurrence.</p> <p>The final reportable spill in 2022 occurred on August 28 and involved water from the quarry that did not meet conductivity criteria for discharge. Agnico explains that initial water quality testing passed all required parameters; however, a grab sample collected prior to beginning discharge exceeded the 500 µS/cm limit but by the time the lab result was received, discharge had been completed. Field measurements taken prior to discharge also exceeded the allowable limit but these results were not flagged. Agnico identified corrective measures to reduce the likelihood of reoccurrence, including:</p> <ul style="list-style-type: none"> • Field measurements will be taken prior to discharge and no discharge will be authorized if any exceedance found. • Any exceedance in field measurements will stand as guidance until such time that results are available from accredited lab. • Field monitoring and Sampling procedures were updated to include a quick reference table of field parameters allowable limits. Procedures are to be reviewed with the environmental personnel. • Our new database will include the exceedance alert system for the quarry's sample station. This will reduce reporting time should an exceedance be noted. <p>The KIA agrees that these measures should improve identification of discharge water exceedances but notes that Project staff may also need training/re-training on procedures outlined in the Quarry Management Plan. Specifically, Section 2.2.4 states that "Following receipt of the laboratory results, water meeting the discharge requirements (Table 2-2) will be discharged." It is surprising that any staff member would think that a release prior to receiving lab results was a reasonable step to take, and this indicates a potential issue with training. It is possible that field measurements and lab analyses may not be 100% in agreement, especially for values that are close to the allowable limit. As such, discharge should be delayed until the results are available from the accredited laboratory even if the field measurements pass criteria. It does not make sense to collect grab samples for lab analyses but not wait to see these results before making decisions, especially when these decisions could result in environmental impacts.</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please clarify if any corrective actions identified after the May 30 underground contact water spill event were implemented before the next spill event on June 16. If not,



	<p>commit undertaking corrective actions immediately to prevent recurrence.</p> <ul style="list-style-type: none"> • Please clarify whether the July 11, 2022 spill investigation considered both May 30 and June 16 events. Please also clarify the reporting timeline to the Inspector. • Please comply with the procedures already outlined in the Quarry Management Plan regarding water quality testing by an accredited laboratory and when discharge can occur. Corrective actions listed by Agnico contain actions already present in their existing plans. So, it is critical that all employees know those plans and adhere to them.
Importance	Moderate

KIA-NIRB-03

Review Comment Number	KIA-NIRB-03
Subject/Topic	Wildlife species of conservation concern
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> • Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) <ul style="list-style-type: none"> ○ Executive Summary, Table 1 ○ Sections 3.9.3.1, 3.9.3.3, 3.9.3.4, 3.11.3.2, 3.11.3.3 ○ Appendices 3.2-7, 3.9-2 <p>Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> • Table 2.3-1; Sections 2.2, 3.1.7, 3.1.9, 3.1.10, 3.1.12 <p>Agnico Eagle, Hope Bay Project, Shipping Management Plan (February 2023)</p> <ul style="list-style-type: none"> • Appendix A: Materials Provided to Vessel Operators, Seabird and Marine Mammal Identification
Summary	There is inconsistent and incomplete information about wildlife species of conservation concern in the WMMP (Jan 2023) and 2022 WMMP Compliance Report. Some species of conservation concern, including migratory birds with nesting observations, are missing from the 2022 WMMP reporting.
Detailed Review Comment	Descriptions of wildlife species of conservation concern (e.g., statuses, inclusion in lists and reporting) are inconsistent within and between Hope Bay Project documents. Agnico



	<p>should endeavour to complete thorough checks and updates of relevant management plans and reports, especially to correct for omissions of federal species at risk. The following documents and sections were identified as requiring updates:</p> <p><u>WMMP (Jan 2023)</u></p> <p>Table 2.3-1 (Species at Risk Observed at Hope Bay and Relevant Plan Sections)</p> <p>In the latest Wild Species 2020 (CESCC, 2022), caribou in general is noted with a territorial ranking of S3S4 (Vulnerable-Apparently Secure). Further refinement for caribou populations can be discerned through NatureServe. Grizzly bear is now territorially ranked as S3 (Vulnerable). Short-eared owl has been designated as Threatened by COSEWIC since May 2021 and is also ranked S3B (Vulnerable) in Nunavut. Peregrine falcon was still considered a species at risk in 2022 but was removed from Schedule 1 of SARA in February 2023, and is ranked S4B (Apparently Secure) in Nunavut. Least sandpiper and brant goose are now considered territorial S5B (Secure). Other species of conservation concern should be added to Table 2.3-1, including Harris' sparrow (Special Concern by COSEWIC and on Schedule 1 of SARA) and marine mammals, such as ringed seal (Special Concern by COSEWIC) and other common whales and pinnipeds included in the identification guides provided by Agnico to shipping operators (Appendix A of Shipping Management Plan): narwhal (Special Concern by COSEWIC), beluga (Eastern High Arctic-Baffin Bay pop., Special Concern by COSEWIC), bowhead whale (Bering-Chukchi-Beaufort pop., Special Concern by COSEWIC and on Schedule 1 of SARA; Eastern Canada-West Greenland pop., Special Concern by COSEWIC), killer whale (Northwest Atlantic/Eastern Arctic pop., Special Concern by COSEWIC), walrus (High Arctic pop., Special Concern by COSEWIC and Vulnerable in Nunavut). The KIA notes that ringed seal was not included in Agnico's marine wildlife ID guides despite this being the representative species for marine mammal VECs.</p> <p>Section 2.2 (Caribou and Muskox Management), Section 3.1.7 (Grizzly Bear Monitoring), Section 3.1.9 (Wolverine Monitoring), Section 3.1.10 (Upland Birds), Section 3.1.12 (Raptors)</p> <p>Update conservation statuses of caribou, grizzly bear, wolverine, upland birds, and raptors as per Table 2.3-1 and comments above. Additional raptors noted in Section 3.1.12 are no longer considered Sensitive/Vulnerable in Nunavut; rough-legged hawk is now ranked S5B (Secure), and gyrfalcon is now ranked S4 (Apparently Secure).</p> <p><u>2022 WMMP Compliance Report</u></p>
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	<ul style="list-style-type: none"> • Executive Summary, Table 1, page x – update Federal Species at Risk as per Table 2.3-1 in the WMMP and comments above. • Section 3.9.3.1, Table 3.9-1 (Species Observations during PRISM Plot Surveys 2022) – Harris’s sparrow, American golden-plover, and semipalmated sandpiper are also species of conservation concern and should be indicated in bold in the table and noted in text in Section 3.9.3.4. • Section 3.9.3.3 (Upland Birds, Wildlife Sightings Log and Incidental Observations) – snow bunting is also a species of conservation concern and should be noted in Section 3.9.3.4. • Section 3.11.3.2 (Raptors, Wildlife Sightings Log and Incidental Observations) – golden eagle is a species of conservation concern and should be noted in Section 3.11.3.3. The status of short-eared owl should also be updated in Section 3.11.3.3. • Appendix 3.2-7 (Summary of the Hope Bay Project Wildlife Sightings Log and Incidental Sightings) – update species conservation statuses as per Table 2.3-1 in the WMMP and comments above. • Appendix 3.9-2 (Bird Observation Data for PRISM Plot Surveys, 2022) – semipalmated sandpiper is a species of conservation concern; thus, their nest observations should also be described in Section 3.9.3.4 of the report.
Recommendation/Request	<ul style="list-style-type: none"> • Please correct the discrepancies noted in the Detailed Review Comment.
Importance	Low

KIA-NIRB-04

Review Comment Number	KIA-NIRB-04
Subject/Topic	WMMP components that should be reported or improved
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> • Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) <ul style="list-style-type: none"> ○ Sections 2.3.4, 2.4, 3.8.3.1, 3.8 ○ Appendices 2.1-1, 3.2-2, 3.2-3, 3.3-1 <p>Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023)</p>



	<ul style="list-style-type: none"> Sections 3.1.5.4, 3.1.6.2, 3.1.2
Summary	Clarification is needed regarding some components of the WMMP (Jan 2023) that were not reported in the 2022 WMMP Compliance Report. The KIA also has recommendations for minor revisions to the WMMP to improve annual reporting of species of interest (e.g., VECs and species of conservation concern).
Detailed Review Comment	<p>Section 3.1.5.4 of the WMMP (Jan 2023) states that “Helicopter flight patches will be recorded by on-board Global Positioning System (GPS) devices including date, time, location, and elevation. Results will be summarized in the annual compliance report.” Helicopter trips were presented in the 2022 WMMP Compliance Report; however, elevation was deliberately excluded from monitoring results. Agnico explains that the compliance report does not examine average or daily flight elevations above ground because “Under all circumstances, helicopters avoid caribou by 300 m vertically and 600 m horizontally, following the WMMP Plan (Agnico Eagle 2021). Should caribou not be present, helicopters are allowed to fly lower than 300 m above ground.” Agnico appears to be referring to policy rather than implementation, but monitoring data are supposed to be collected to provide proof of compliance. Annual reporting should include confirmation that pilots did indeed avoid caribou by 300 m vertically and 600 m horizontally when caribou were observed. There were no caribou (or any wildlife) observations logged by pilots in the 2022 WMMP Compliance Report; can Agnico confirm if pilots observed caribou and avoided them accordingly? It is unclear in the WMMP if pilots are encouraged or required to report incidental wildlife (especially caribou) observations.</p> <p>Section 3.1.6.2 of the WMMP describes local caribou monitoring and states that “Snow track surveys will be conducted along Project roads during winter months in conjunction with snowbank height monitoring (Section 3.1.5.2). Surveys will be conducted twice per month (SOP: Snow Track and Snowbank Height Monitoring).” Section 2.4 of the 2022 WMMP Compliance Report focuses on snowbank monitoring but there is no mention of snow track surveys.</p> <p>Section 3.1.2 of the WMMP described what the camera monitoring program is focused on: wildlife VECs (caribou, grizzly bears, muskox, wolverines, raptors) and nest predators (Arctic fox and red fox). For consistency, wolf should be included in the list of mammalian nest predators, and avian nest predators (common raven, gulls, jaegers) should also be included, as these species are reported on as nest predators in the 2022 WMMP Compliance Report (Section 3.8; inclusion of</p>



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	<p>wolf as a nest predator is also explained in Section 5.1 of Appendix 2.1-1). The KIA recommends that wildlife species of conservation concern also be flagged during image processing if any are captured on camera. Currently, Agnico reports “Other Wildlife” recorded in Appendix 3.2-2, and it is unknown if any species of conservation concern among upland birds and waterbirds may have been detected. (Note: there is a discrepancy between Section 3.8.2 (Nest Predators, Methods) in the main body of the 2022 WMMP Compliance Report and Section 3 of Appendix 2.1-1 (Detailed Methodology for the Hope Bay Project Programs, 2022). The latter document states that avian nest predators and small mammals (weasels) were not included in the camera data analyses; however, the former document only references the exclusion of small mammals. Based on the 2022 WMMP Compliance Report results (Section 3.8.3.1, Appendix 3.2-3, Appendix 3.3-1), avian nest predators were included in the analyses.)</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please clarify if pilots observed caribou in 2022 and confirm that pilots avoided caribou by 300 m vertically and 600 m horizontally. Please also consider requesting pilots to record incidental caribou observations during their flights. • Please clarify if snow track surveys were completed alongside snowbank monitoring in 2022, as required in Section 3.1.6.2 of the WMMP, or explain why they were not completed or reported on. Please also consider distributing the Snow Track and Snowbank Height Monitoring SOP to the KIA and other interested parties for review. • Please consider flagging upland bird and waterbird species of conservation concern for reporting if any are detected through the camera monitoring program.
Importance	Low



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KIA-NIRB-05

Review Comment Number	KIA-NIRB-05
Subject/Topic	Pre-blasting deterrent options and criteria
References	<p>Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> Section 2.9, Table 2.9-1
Summary	More information about pre-blasting deterrent options and criteria, especially drones, is needed in the WMMP.
Detailed Review Comment	<p>Agnico updated the Blast Management section of the WMMP (Jan 2023). Section 2.9 now includes pre-blasting deterrent options for caribou and muskox, including drone, human line, light vehicle (e.g., pick-up truck), and noise deterrents. Agnico also briefly outlines the criteria when each deterrent option should be used; however, additional information about the appropriateness of each deterrent for each species would be useful. For example, Sabina's WMMP Plan for the Back River Project indicates that "the presence of a light pickup truck or person near the muskox is all that is required to encourage muskox to leave the area." Is there a preferred hierarchy of methods to use?</p> <p>Furthermore, drones are a relatively new technology. Drones have been used for studying caribou, including the Dolphin and Union herd (Torney et al., 2018) and for hunting caribou in the NWT (The Canadian Press, 2019); however, research or reports on using drones for caribou deterrence appear to be lacking. Does Agnico have insight into how caribou will react to drones when used as a deterrent? Please provide or reference supporting materials or previous experience at other projects for the statement that "Drones are more effective for smaller groups of 1-10 animals."</p>
Recommendation/Request	<ul style="list-style-type: none"> Please provide rationale and supporting information or previous experience at other projects for the use of drones as a deterrent option for caribou and/or muskox. Please include additional details in Table 2.9-1 for species-specific criteria and preferred hierarchy of methods, if applicable.
Importance	Moderate



KIA-NIRB-06

Review Comment Number	KIA-NIRB-06
Subject/Topic	Drilling program at Madrid outside the FEIS
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) <ul style="list-style-type: none"> Executive Summary, Table 1 Sections 2.3.3.1, 2.3.4 <p>Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> Sections 3.1.5.3, 3.1.5.4
Summary	Agnico does not discuss potential adaptive management needed for exceedances of FEIS predictions for air traffic, regardless of whether the Project activities were included in the FEIS or not (e.g., drilling program at Madrid that resulted in twice the amount of air traffic anticipated).
Detailed Review Comment	In the Executive Summary, Table 1, page iii (Helicopter and Fixed-wing Flight Monitoring), and Section 2.3.4 of the 2022 WMMP Compliance Report, Agnico explains that the increased helicopter traffic in the Doris area – almost double number of helicopter trips per day compared to the FEIS predictions (19.2 vs. 10 trips per day; Section 2.3.3.1) – is due to a drilling program that was not part of regular operations included in the Madrid-Boston FEIS. Agnico does not provide further discussion about how the FEIS may not have included all anticipated or necessary Project activities or that the predictions may need to be adjusted due to unanticipated Project changes. As noted in a previous technical comment (see KIA-NIRB-04: WMMP components that should be reported or improved), Agnico also failed to provide helicopter monitoring data to prove elevational compliance. It is unclear if Agnico plans to continue using this rationale of activities not included in the FEIS to justify exceedances in impact predictions. The WMMP (Jan 2023), Sections 3.1.5.3 and 3.1.5.4, has no thresholds for adaptive management if air traffic monitoring results exceed FEIS predictions. As such, it is also unclear what Agnico would do to mitigate sensory disturbance if there are more fixed-wing and helicopter flights than anticipated.
Recommendation/Request	<ul style="list-style-type: none"> Please consider adjusted impact predictions if unanticipated Project activities not included in the 2017 FEIS are occurring. Alternatively, provide additional data



	<p>and mitigation measures alongside clear compliance monitoring data that includes elevation, as required in Section 3.1.5.4 of the WMMP, to prove that additional aircraft will not impact caribou beyond levels predicted in the FEIS.</p> <ul style="list-style-type: none"> Please clarify how Agnico will apply adaptive management if air traffic monitoring results exceed FEIS predictions and include these details in the next iteration of the WMMP.
Importance	Moderate

KIA-NIRB-07

Review Comment Number	KIA-NIRB-07
Subject/Topic	Noise monitoring equipment and SOP
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> Section 3 Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) Section 2.5 <ul style="list-style-type: none"> Appendix 2.5-1: Hope Bay Quarry Blast Noise Monitoring SOP <p>Agnico Eagle, Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report (August 2022)</p> <ul style="list-style-type: none"> KIA-NIRB-5
Summary	The Quarry Blast Noise Monitoring SOP requires revisions due to a change in equipment. Agnico should confirm that no blasting activities occurred in 2022. It is unclear if noise monitoring will be ready for implementation in 2023.
Detailed Review Comment	<p>In Section 2.5 of the 2022 WMMP Compliance Report, Agnico states that <i>"Noise monitoring testing was conducted on three occurrences in August 2022. Tests were conducted using a SoundAdvisor™ Model 831C, which is different than the measurement equipment indicated in the SOP. Testing indicated that equipment was functional but additional work is required to update the SOP and obtain results sufficient for testing the sound level at varied distances from blasts."</i></p> <p>As far as the reviewer is aware, noise monitoring has not been conducted for any blasting activity at the Project. The KIA inquired about noise monitoring during our review of the 2021 NIRB Annual Report (KIA-NIRB-5). Agnico responded that "Noise monitoring was not conducted during blasts in 2021. An</p>



	<p>attempt to monitor the blast in December 2021 was undertaken, however wind speeds and health and safety concerns for personnel travelling off-road in winter conditions prevented the monitoring from taking place. Monitoring and Equipment were not ready to conduct monitoring during prior blasts. In 2022, noise monitoring will be conducted during blasts following the SOP and results of this monitoring will be provided as part of the annual WMMP report.”</p> <p>It is unfortunate that the Quarry Blast Noise Monitoring SOP is still not ready to implement. Why did Agnico decide to switch to different equipment? There were no blasting activities explicitly mentioned in Section 3 (Summary of Project Activities in 2022) of the 2022 Annual Report; however, Agnico should confirm that no blasting (and thus no noise monitoring) was needed in 2022. Will noise monitoring be conducted during blasts in 2023?</p> <p>With respect to the current Quarry Blast Noise Monitoring SOP, it is assumed that the same field data sheet (Attachment B) can be used with the new equipment. Additional spaces/fields should be added to the data sheet for consistency with Section 1.3 (Data Collection Procedures) of the SOP, including for date and time of the blast, relative humidity (%), precipitation (mm), and calibration results.</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please confirm that no blasting activities occurred in 2022. • Please explain why Agnico decided to change noise monitoring equipment and clarify if the Quarry Blast Noise Monitoring SOP will be ready for deployment in 2023. • Please update the noise monitoring field data sheet as described in the detailed review comment.
Importance	Low

KIA-NIRB-08

Review Comment Number	KIA-NIRB-08
Subject/Topic	Camera tripod repairs and upgrades
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> • Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) <ul style="list-style-type: none"> ○ Section 3.3.1



	<p>Agnico Eagle, Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report (August 2022)</p> <ul style="list-style-type: none"> KIA-NIRB-11
Summary	<p>Agnico repaired/rebuilt five camera tripods in 2022. The repaired/rebuilt setup shown in Photo 3.3-1 appears to have a new camera enclosure, which may be intended to mitigate snow occlusion. If this design is found to be effective, please install enclosures on all remaining cameras deployed.</p>
Detailed Review Comment	<p>The KIA commented on ongoing issues with snow occlusion and grizzly bear damage during our review of the 2021 NIRB Annual Report (KIA-NIRB-11). In response, Agnico stated that they were <i>"planning to update the camera tripods during 2022... Tripods are currently being reinforced with metal brackets and new wood where required, for greater durability and stability. Shields to reduce snow/ice occlusion will be researched and considered."</i></p> <p>Section 3.3.1 of the 2022 WMMP Compliance Report indicates that five cameras (4 out of 59 cameras at Doris and Madrid; 1 out of 29 cameras at Boston) were repaired or rebuilt in 2022. Is Agnico planning to continue repairing/rebuilding the remaining 55 cameras at Doris-Madrid and 28 cameras at Boston in 2023 and beyond? Were the two additional cameras deployed near a Windy Road culvert in August 2022 using this new setup? From Photo 3.3-1, it appears that Agnico selected a wooden enclosure design around the camera, in addition to the reinforcements described above. Is this enclosure intended to mitigate snow occlusion? If so, it would be useful to install on all cameras if they are found to be effective.</p> <p>Depending on the amount of time it takes to install enclosures on the remaining 83 cameras (or 85 if the Windy Road culvert cameras do not have the new setup), special consideration may be needed to account for the higher camera effort (operational days) expected on the 'upgraded' tripods. For example, the number of camera tripods adjusted per year should be relatively equal within the three zones (Treatment, ZOI, Control).</p>
Recommendation/Request	<ul style="list-style-type: none"> Please clarify if the camera enclosure shown in Photo 3.3-1 is meant to mitigate snow occlusion. If this design is effective, please endeavour to 'upgrade' the remaining 83 cameras deployed in the Project study areas (55 at Doris-Madrid, 28 at Boston). Please provide a timeline for how long it would take to install the camera enclosures on all cameras. If it is estimated to take several years, please consider



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	selecting the same number of cameras in the Treatment, ZOI, and Control zones each year.
Importance	Moderate

KIA-NIRB-09

Review Comment Number	KIA-NIRB-09
Subject/Topic	Ground-based waterbird surveys and incidental observations
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) <ul style="list-style-type: none"> Sections 3.10.2.1, 3.10.3.4 Appendices 3.2-5, 2.1-1 <p>Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> Section 3.1.11.1
Summary	Ground-based surveys for waterbird monitoring occurred for the first time in 2022 and focused on the Doris and Madrid areas. It is unclear why areas around Boston and the All-Weather Road (AWR) were not also surveyed. The incidental observation of hooded mergansers could be real; any future sightings should continue to be reported. Additional information is requested about the two nesting waterbirds observed incidentally.
Detailed Review Comment	Agnico conducted ground-based surveys for waterbirds for the first time in 2022. Fifteen survey sites were located along shorelines at varying distances (26 m to 7.8 km) from site infrastructure (Table 3.10-1) and focused on the Doris and Madrid areas (Figure 3.10-1). It is unclear why ground-based waterbird surveys were not also conducted in the Boston area or around the AWR, since the purpose of these surveys is “to gather information on ongoing waterbird habitat use and the potential presence of species at risk in the area” (Section 3.10.2.1 of the 2022 WMMP Compliance Report) at ponds near and farther (>2 km) from Project infrastructure (Section 3.1.11.1, WMMP). No additional information is available in Appendix 2.1-1, Section 6.7.1 (Detailed Methodology for the Hope Bay Project Programs, 2022). Will the program be expanded to the Boston site and AWR in future years?



	<p>In Section 3.10.3.4, Agnico states that two hooded mergansers were recorded (a pair observed in Robert's Bay on September 6, 2022; Appendix 3.2-5) but added that they <i>"are out of range in the Hope Bay area, but this sighting may be another merganser species."</i> Hooded mergansers are quite distinct, though perhaps they were misidentified from afar. Nonetheless, it is interesting to note that while the species' range maps typically do not indicate their presence in northern Canada, there are recent eBird sightings of hooded mergansers around Yellowknife and one sighting in 2022 at Point Lake in NWT near the Nunavut border. This species may be expanding northward, and it would be interesting to confirm their presence near the Project.</p> <p>Other incidental waterbird observations of note in Appendix 3.2-5 include nesting of white-fronted goose at the Patch Lake outflow (observation no. 94) and nesting of a loon species at KM4/5 Windy Road (observation no. 143). Did either of these waterbird nests require mitigation and monitoring, such as setting up avoidance buffers to minimize disturbance from Project activities and monitoring for nesting outcome? Observations of nesting birds should be included in the main 2022 WMMP Compliance Report.</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please explain why the ground-based waterbird surveys in 2022 focused only on Doris-Madrid and clarify if this monitoring program will be expanded to Boston and the AWR in future years. • Please encourage Project staff to continue recording incidental wildlife observations as rare or unusual species may occur. • Please confirm if the two nesting waterbirds observed on site required mitigation and monitoring due to nearby Project activities.
Importance	Low

KIA-NIRB-10

Review Comment Number	KIA-NIRB-10
Subject/Topic	Wildlife interactions, incidents, and mortalities
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> • Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) <ul style="list-style-type: none"> ○ Sections 3.11.3.1, 3.3.3, 3.9.3.2, 3.8.3.2, 3.10.3.3, 3.2.2



	<ul style="list-style-type: none"> ○ Appendices 3.2-4, 3.2-5, 2.1-1 <p>Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023)</p> <ul style="list-style-type: none"> • Section 3.1.3
Summary	<p>An un-occupied common raven nest was moved from a satellite dish at Boston to the ground at the end of the Boston runway. The relocated nest is unlikely to be reused (as-is and in the location placed) by stick-nesting species. Raven nests are usually re-used by cliff nesting raptors or ravens, and not by the short-eared owl (the only ground-nesting raptor in the area). This appears to be a nest removal rather than a functional nest relocation. If so, it should be characterized as such and permissions to remove or destroy the nest should be included in reporting. Please clarify the terms of the Government of Nunavut Department of Environment (GN DOE) permit for this action. In addition, two incidental observations of deceased wildlife (Lapland longspur and sik sik), and one observation of a wolf circling Project staff, were not discussed in the 2022 WMMP Compliance Report.</p>
Detailed Review Comment	<p>In Section 3.11.3.1 and Appendix 3.2-4, Agnico explains that a non-occupied common raven nest was found on a satellite dish at the Boston Exploration camp. Agnico received a permit from the GN DOE to remove the nest as it presented a potential fire hazard. Agnico moved the nest to the end of the Boston runway, 800 m from the camp. It is unclear what this move was intended to accomplish as the nest, as-is, is extremely unlikely to be reused by common ravens or other stick-nesting raptors when located on the ground (Photo 3.11-2). However, it is possible that the materials will be gathered and reused by ravens or other animals. If the GN DOE permit stipulated that a 'functional' nest should be maintained, a different location above ground (>3 m if possible) should have been chosen. If the permit allowed for the removal of the nest, and they requested it be left on site such that other birds can gather materials for nest building from it, this should be indicated. Currently, the document seems to imply that the nest was moved to retain the functionality of a stick nest, which does not make sense given species nesting behaviours in the area.</p> <p>In Appendix 3.2-5, there were two incidental observations of deceased wildlife not reported in the main body of the 2022 WMMP Compliance Report. A deceased Lapland longspur was found at Little Robert's Lake in the hydrology station area on July 29, 2022 (observation no. 200), and a deceased sik sik was found on the road by the Geo Shop on August 11, 2022 (observation no. 223). Did the Lapland longspur collide with Project infrastructure? As per Section 3.1.3 (Incident and</p>



	<p>Mortality Monitoring) of the WMMP (Jan 2023) and Section 4 (On-site Monitoring and Mitigation) of Appendix 2.1-1 (Detailed Methodology for the Hope Bay Project Programs, 2022), migratory bird incidents and mortalities should be reported to ECCC/CWS. Although sik sik mortality does not require reporting to external organizations (as it is deemed an interaction), both of these events should have been discussed in Section 3.9.3.2 (upland birds) and Section 3.3.3 (non-VEC observations).</p> <p>Also in Appendix 3.2-5, observation no. 114 indicates that a wolf was circling/stalking field geologists while they were prospecting northeast of Doris Mountain, and a helicopter had to be called to pick them up. Furthermore, observation no. 252 involved a close call with a pair of flying loons east of Robert's Bay; "Quick action on the part of the Heli pilot avoided potential interaction with the Avians". (Note: an aircraft collision with the loons would have been a wildlife incident rather than an interaction, as defined in Section 3.2.2 of the 2022 WMMP Compliance Report.) Although neither of these events resulted in direct injury or mortality to wildlife, both observations should have been reported as wildlife interactions in Section 3.8.3.2 (nest predators) and Section 3.10.3.3 (waterbirds).</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please provide more information about the GN DOE permit for stick nest removal and clarify if the common raven nest should have been relocated to an area where it can be reused (as-is) by stick-nesting species. • Please provide more information about the deceased Lapland longspur, such as suspected cause of mortality and if the mortality was reported to ECCC/CWS. • Please include the wolf circling/stalking and aircraft close call with flying loons interactions in the 2022 WMMP Compliance Report.
Importance	Moderate

KIA-NIRB-11

Review Comment Number	KIA-NIRB-11
Subject/Topic	Camera effort, twice-yearly checks, and summary data
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> • Appendix D-3 – Hope Bay Project: 2022 Wildlife Mitigation and Monitoring Program Compliance Report (March 2023) <ul style="list-style-type: none"> ○ Section 3.2, Table 3.2-1



	<ul style="list-style-type: none">○ Appendices 3.2-1, 3.2-3 Agnico Eagle, Hope Bay Project, Wildlife Mitigation and Monitoring Plan (January 2023) <ul style="list-style-type: none">● Section 3.1.2																																										
Summary	Five wildlife cameras had low camera effort even during the month after presumed camera checks. It is possible that the cameras were immediately knocked down after checks; any insight Agnico may have for the low camera effort would be informative. There may also have been some camera data collection, entry, and/or management issues.																																										
Detailed Review Comment	<p>Appendix 3.2-1 of the 2022 WMMP Compliance Report presents Wildlife Camera Locations and Camera Effort by Month, Doris and Madrid Areas, June 2016 to September 2022. Camera effort is defined in Section 3.3.2 of Appendix 2.1-1: <i>“Camera effort was calculated as the total number of active deployment days from September 2021 to September 2022. Cameras occluded by snow (25% or more of the screen occluded) for 24 hours or more were considered to have no effort until the screen cleared (75% visibility or better). Cameras were also considered to have no effort during periods in which they were knocked over.”</i></p> <p>Section 3.1.2 of the WMMP (Jan 2023) indicates that cameras are downloaded a checked twice annually at a minimum; and the notes under Table 3.2-1 in the 2022 WMMP Compliance Report state that <i>“Camera checks are performed in June and September, though checks were not completed on the same day at a given camera in each year.”</i> Based on this camera check schedule, one may expect that camera effort would be highest in June/July and September/October, depending on the actual check date, when the batteries are full, tripods are righted after being knocked down, lens are cleaned, etc. However, the following five units had very low camera effort in 2022 and did not follow the expected pattern of active deployment except in June 2021:</p> <table><tr><th>Camera no.</th><th>Total effort</th><th>Average effort</th><th>Jun 2021</th><th>Sep 2021</th><th>Jun 2022</th><th>Sep 2022</th></tr><tr><td>15</td><td>66</td><td>3.6</td><td>12</td><td>0</td><td>0</td><td>22</td></tr><tr><td>36</td><td>61</td><td>3.4</td><td>14</td><td>0</td><td>0</td><td>24</td></tr><tr><td>45</td><td>51</td><td>2.8</td><td>30</td><td>1</td><td>2</td><td>0</td></tr><tr><td>49</td><td>55</td><td>3.1</td><td>7</td><td>2</td><td>0</td><td>0</td></tr><tr><td>60</td><td>107</td><td>5.9</td><td>18</td><td>27</td><td>0</td><td>0</td></tr></table>	Camera no.	Total effort	Average effort	Jun 2021	Sep 2021	Jun 2022	Sep 2022	15	66	3.6	12	0	0	22	36	61	3.4	14	0	0	24	45	51	2.8	30	1	2	0	49	55	3.1	7	2	0	0	60	107	5.9	18	27	0	0
Camera no.	Total effort	Average effort	Jun 2021	Sep 2021	Jun 2022	Sep 2022																																					
15	66	3.6	12	0	0	22																																					
36	61	3.4	14	0	0	24																																					
45	51	2.8	30	1	2	0																																					
49	55	3.1	7	2	0	0																																					
60	107	5.9	18	27	0	0																																					



	<p>There were also subsequent months of zero camera effort after the presumed camera checks (not summarized in the table above). It is possible that these cameras became non-operational soon after the checks (e.g., knocked over the same night or the next day <24 hr. later). For example, Cameras 45 and 49 each had a single grizzly bear event captured on June 2, 2022 and May 26, 2022, respectively, where the bear was investigating the camera (Appendix 3.2-3). Agnico should confirm that all cameras were checked twice a year, as outlined in the WMMP, and confirm the camera check dates for 2021 and 2022. Any insight into the low camera effort for these and other units would be useful.</p> <p>On a related note, it appears that some comments in Appendix 3.2-3 are misplaced. Examples:</p> <ul style="list-style-type: none"> • Camera 4 on July 3, 2022: Caribou grazing event has a comment for “<i>Bear knocked the camera down</i>”. Perhaps this note should be in the line above for a grizzly bear investigating camera event (Camera 4 on October 4, 2021). • Camera 36 ON July 25, 2022: Caribou walking event has a comment for “<i>Two grizzly bears noted in images captured while camera was knocked down.</i>” The next line has a grizzly bear investigating camera; however, it is a different camera (37) and there is only one animal noted. <p>There are also two entries for Camera 30 on August 4, 2022 of grizzly bears walking with the same comment, “<i>Presumed to have been observed 2022-07-16.</i>” Was this related to a camera malfunction?</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please provide some insight into the very low camera effort for certain units in 2021-2022, especially for months where the cameras may be expected to be the most functional (i.e., after checks). • Please confirm that all cameras were checked twice yearly at minimum, as per the WMMP. • Please verify that the Comments in Appendix 3.2-3 have not been accidentally reshuffled amongst wildlife event entries. <p>Please clarify if there were other camera malfunctions in 2021/2022, including date errors.</p>
Importance	Low



KIA-NIRB-12

Review Comment Number	KIA-NIRB-12
Subject/Topic	Monitoring vessel noise and marine wildlife in Robert's Bay
References	<p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p> <ul style="list-style-type: none"> Section 6.2, New Term and Condition No. 33 <p>Agnico Eagle, Hope Bay Project, Shipping Management Plan (February 2023)</p> <ul style="list-style-type: none"> Section 4
Summary	<p>Agnico's new "Monitoring Vessel Noise and Marine Wildlife – Robert's Bay" program in the Shipping Management Plan consists of visual surveys to record the presence/absence of marine wildlife before, during, and after shipping. Underwater acoustic monitoring using hydrophones should be conducted in conjunction with visual surveys. Noise modelling should also be completed to assess underwater noise disturbance due to shipping activities occurring at present and marine construction activities to occur in the future.</p>
Detailed Review Comment	<p>Agnico added a new Section 4: Monitoring Vessel Noise and Marine Wildlife – Robert's Bay among their updates to the Shipping Management Plan (Feb 2023). This monitoring program is intended to satisfy the Madrid-Boston Project Certificate No. 009, New Term and Condition (T&C) No. 33, which states: <i>"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."</i> The objective of this T&C is to ensure that project activities and project-related marine shipping do not cause unacceptable noise exposure to marine wildlife.</p> <p>Agnico's new noise monitoring program involves visual surveys to determine the presence/absence of marine wildlife (primarily seals) with and without the presence of ships in Roberts Bay using a Before-During-After study design (Section 4.1). Data to be recorded will include, but is not limited to, the number and species of marine wildlife observed, number of vessels in the Bay and locations, environmental variables, etc. Agnico states that if analyses indicate the marine wildlife may be avoiding Roberts Bay while vessels are present, adaptive management measures to mitigate adverse impacts of project-related noise will be developed.</p>



	<p>It is unclear how the proposed noise monitoring program can address New T&C No. 33 without also monitoring underwater noise directly. Agnico does not list vessel type, size, and speed – which also contribute to differing underwater noise levels and frequencies (Heise, 2018; National Research Council (U.S.). Committee on Potential Impacts of Ambient Noise in the Ocean on Marine Mammals, 2003) – as information to be recorded. Visual surveys will be limited by distance and may not capture the extent of vessel noise disturbance, as sound can travel great distances underwater. Noise modelling should be performed to assess the sound pressure level (loudness), frequency, and distance attenuation of noise produced by shipping vessels that enter and leave Robert’s Bay. Furthermore, adaptive management is not possible if one does not know the underwater noise levels associated with negative responses.</p> <p>Acoustic monitoring using hydrophones should be used in conjunction with the visual surveys. Hydrophones detect sounds made by marine wildlife and shipping vessels; thus, in addition to determining the presence/absence of animals, analysis of acoustic monitoring data from hydrophones can help evaluate if underwater noise disturbance is affecting wildlife behaviour and interfering with communication (“acoustic masking”). Underwater acoustic monitoring is often focused on whales; however, pinnipeds (seals) also produce noises to communicate underwater (Heise, 2018; National Research Council (U.S.). Committee on Potential Impacts of Ambient Noise in the Ocean on Marine Mammals, 2003). Loud underwater noise can also cause injury and death to fish due to pressure changes, which can impact marine mammals. Monitoring noise can enable correlations to be made between large fish die-offs after events like underwater construction or blasting, and subsequent loss of marine mammals.</p> <p>Agnico states in their comments under New T&C No. 33 that additional monitoring will be included for marine construction activities related to Madrid-Boston, but that no marine construction was completed in 2022 or expected to commence in 2023. Are underwater noise modelling and hydrophone acoustic monitoring part of the plan for when marine construction activities begin? The KIA recommends utilizing these methods earlier to allow for proper monitoring of vessel noise and marine wildlife in Robert’s Bay and to collect some existing conditions data (before part of the BACI design) prior to marine construction.</p>
Recommendation/Request	<ul style="list-style-type: none"> • Please provide rationale for how visual surveys alone will accomplish the noise monitoring requirements



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	<p>outlined in the Project Certificate No. 009, New Term and Condition No. 33.</p> <ul style="list-style-type: none"> • Please explain what additional noise monitoring is planned when marine construction activities begin. • Please include hydrophone acoustic monitoring and noise modelling to assess and monitor underwater noise disturbance by shipping vessels (and marine construction activities in the future) at Robert's Bay.
Importance	High

KIA-NIRB-13

Review Comment Number	KIA-NIRB-13
Subject/Topic	Review of commitments for NIRB Monitoring Report
References	<p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendices A and B <p>Agnico Eagle, Hope Bay Project, 2022 Nunavut Impact Review Board Annual Report (April 2023)</p>
Summary	<p>The NIRB requested comments on the Doris North and Phase 2 Hope Bay Belt commitments in March 2023 prior to distribution of Agnico's 2022 Annual Report. A copy of the KIA's review comments for these commitments is attached and should be considered as part of our 2022 Annual Report review, if these comments are not already being addressed by Agnico.</p>
Detailed Review Comment	<p>In March 2023, the NIRB requested that Agnico and Regulatory Authorities comment on the 2006 and 2016 Doris North Commitments and the Phase 2 Hope Bay Belt commitments. This request was made prior to the public distribution (upload to NIRB registry) of the 2022 Annual Report. As such, the KIA used the 2021 Annual Report and other existing Project documents in our review and submitted comments to the NIRB in May, 2023.</p> <p>Due to the timeline, Agnico did not have an opportunity to address Commitments review comments from the KIA and other parties in the 2022 Annual Report. To date, neither a compilation of intervenor comments nor Agnico responses to these comments has been uploaded to the NIRB registry. As many of the KIA's comments were still applicable when reviewing the 2022 Annual Report, and it is unclear whether Agnico is in the process of addressing these comments, we have</p>



	included a copy of our comments in Appendix A – Review of Wildlife and Vegetation Commitments.
Recommendation/Request	<ul style="list-style-type: none"> • Please clarify whether the KIA's review comments for the Doris North and Phase 2 Hope Bay Belt commitments have been/are being reviewed by Agnico and are in the process of being addressed. • If not, please refer to the KIA's comments in Appendix A – Review of Wildlife and Vegetation Commitments and consider these as part of our 2022 NIRB Annual Report review.
Importance	High

KIA-NIRB-14

Review Comment Number	KIA-NIRB-14
Subject/Topic	Trend in Doris Lake chlorophyll-a concentration
References	Appendix D-4: Hope Bay Project: 2022 Aquatic Effects Monitoring Program Report Section 2.2.3.2, Section 3.5.1 Figure 3.5-1; Tables 3.5-3, 3.5-4
Summary	The criteria for triggering a low action level response for Doris Lake chlorophyll- α were met yet no response was deemed necessary. The increasing chlorophyll- α concentration of Doris Lake is of potential concern. More generally, based on this issue, the monitoring program structure appears to be internally inconsistent (i.e., the text of Section 2.2.3.2 contradicts that of Section 3.5.1).
Detailed Review Comment	<p>It is noted that there is a significant increasing trend in Doris Lake chlorophyll-α, that this trend is not occurring in the reference lake, and that concentrations are above baseline:</p> <p>“The Doris Lake chlorophyll α trend through time was significantly different from a slope of zero ($p < 0.05$) as well as the trend observed in Reference Lake B through time ($p < 0.05$).”</p> <p>“the mean 2022 phytoplankton biomass in Doris Lake was elevated compared to the single baseline year (2009),”</p> <p>Therefore, the conditions of Section 2.2.3.2 have been met:</p>



	<p>“The following conditions must be met for an exceedance of the low action level for chlorophyll a concentration (TMAC 2018):</p> <ol style="list-style-type: none"> 1. The identification of a statistically significant change from baseline concentrations; 2. The concentration of chlorophyll a is outside of the normal range based on baseline concentrations; and 3. If a change is detected at the exposure site, there is no similar change at the reference site.” <p>However, despite fulfillment of the criteria, it was reasoned that no low action level response was needed, based on the following:</p> <p>“Although the conditions were met in Doris Lake there was no plausible Project-related source for the observed changes; therefore, no low action level responses were triggered for phytoplankton in 2022.”</p> <p>“In addition, there was no evidence of increased nutrient inputs to Doris Lake (Sections 3.3.6 to 3.3.9) that would provide a causal mechanism for any observed increase.”</p> <p>The set of conditions in Section 2.2.3.2 does not include evidence of a causal mechanism. Even in the absence of increased nutrient inputs, it is likely that climate change is altering nutrient cycling in Arctic lakes due to effects on stratification and mixing (e.g., longer ice-free period and higher temperatures lead to enhanced cycling of nutrients between the sediments and water column).</p>
Recommendation/Request	It should be clearly stated in Section 2.2.3.2 whether the 3 criteria are sufficient to trigger a low action level response (which appears to be the intended meaning), or whether they are merely necessary conditions, and the determination as to whether a low action level exceedance has occurred is subject to additional considerations and professional judgement (as in Section 3.5.1).
Importance	Moderate

KIA-NIRB-15

Review Comment Number	KIA-NIRB-15
Subject/Topic	AEMP Modelling Approach
References	Appendix D-4: Hope Bay Project: 2022 Aquatic Effects Monitoring Program Report



	Sections 3.3, C.2, C.3
Summary	The modelling methodology and results could be presented with greater clarity. Modifications to the modelling approach (as suggested below) may improve and/or simplify the approach in some ways and should be considered. The evaluation of temporal trends in the AEMP parameters is of central importance to the AEMP.
Detailed Review Comment	<p>Trends were assessed using linear mixed modelling in most cases; Tobit regression was used to analyse highly censored datasets. A logarithmic transformation was applied in most cases to yield an error distribution that was approximately Gaussian. In some cases, models were fit separately for each season, in others seasonality was a component of the model. "Depth was accounted for in the model but not evaluated since its effect is not of primary interest". LOESS curves were displayed on the timeseries plots.</p> <p>Rather than apply data transformations, a generalized model could be used; this would allow non-normal error distributions to be modelled. It is not clear why seasonality was included as a factor in some of the models and in others the models were applied separately for each season. The decision to include both the surface and deep samples in the same model should be explained more fully – off-bottom samples tell us something particular about the lake (influence of sediment geochemistry); if the goal is to understand the general lake chemistry, it would be better to include only the upper mixed layer data. The relationship between the linear models and the non-linear (LOESS) curves should be clearly explained in the text. If non-linear trends are of interest, would the best model type be of the generalized additive mixed model (GAMM) variety rather than a linear mixed model? In some cases, the smooths are misleading (i.e., the apparent trends are driven by very little data; e.g., under-ice chloride of Patch Lake). Finally, the explanation of Tobit analysis (a relatively uncommon technique) could be improved – it is not clear to this reviewer how exactly the censored data are estimated or why a normal distribution is appropriate – additional plain language explanation (rather than mathematical notation) would be helpful.</p> <p>Overall, it may be that no changes are needed to the model structure, but the suggested alternatives should be explored, and at a minimum, the relationship between the LOESS smooths and linear models must be clarified in the text.</p>



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Recommendation/Request	Please evaluate the effectiveness of alternative modelling approaches (e.g., generalized additive mixed models) and clarify the rationale for the chosen modelling approach and how the visualizations (including LOESS curves) relate to the model predictions.
Importance	Moderate

KIA-NIRB-16

Review Comment Number	KIA-NIRB-16
Subject/Topic	Dustfall exceedances in June and August 2022
References	Appendix D-1 Q1-Q3 2022 Atmospheric Compliance Monitoring Program Reports – Doris and Madrid Projects Section 4.2 – Canister Dustfall Monitoring Results Table 4-6 Page 27-31
Summary	Dustfall measurements from canister monitoring exceeded exceedances AAAQO for residential and recreation areas in June and August 2022, while measurements were well below the air quality objective in July. No discussion of the reasoning for these summer exceedances was provided in the report. The cause of dustfall exceedances at the Madrid site in 2022 is important for future monitoring, as causes of exceedances should be documented.
Detailed Review Comment	Dustfall exceedances were measured in June and August 2022 at the Madrid site from canister dustfall monitoring (66.6 and 88.2 mg/100 cm ² /30 days in June and August, respectively). Exceedances were measured 50 m from the all-weather road, in the downwind direction (station MDF07). In July 2022, however, dustfall at this station was much lower (6.3 mg/100 cm ² /30 days), despite a similar prevailing wind direction to June monitoring (ENE vs. E, respectively). The report does not discuss the reason for these exceedances. Were canisters collected at the same time each month, and was vehicular traffic on the all-weather road greater in July compared to other summer months?
Recommendation/Request	AEM is recommended to provide further information on the reasons/hypotheses for the dustfall exceedances in June and August 2022, given that July monitoring was well below other summer dustfall concentrations.
Importance	Moderate



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KIA-NIRB-17

Review Comment Number	KIA-NIRB-17
Subject/Topic	Text and figure are missing sampling stations.
References	2022 Waste Rock and Ore Monitoring Report, Boston Camp Monitoring Requirements FINAL Section 4.1 Sample Collection and Figure 2.1
Summary	Stations are missing from the Seepage Survey Locations figure and text.
Detailed Review Comment	No mention is made of following seepage sites in either Section 4.1 or Figure 2.1: BOS-8B, BOS-8C and at the southern end of the airstrip
Recommendation/Request	Please include discussion of these sampling stations and include them on Figure 2.1 or provide text that explains why these sites have been neglected.
Importance	Low

KIA-NIRB-18

Review Comment Number	KIA-NIRB-18
Subject/Topic	Historic seepage data
References	2022 Waste Rock and Ore Monitoring Report, Boston Camp Monitoring Requirements FINAL Tables 4.3 and 4.4.
Summary	No context is provided for the historic seepage data.
Detailed Review Comment	Three historic seepage sites (P5, P50, P95) are listed with values for general parameters, major total ions, nutrients and total metals but no locations or year of sampling are included. It is therefore not possible to draw any conclusions regarding significance of the historic data. Several of the values are substantially different than 2022 data but without context, the importance of these differences if any, cannot be determined.
Recommendation/Request	Please provide the year and location of these sampling stations and an explanation addressing the differences in values.
Importance	Moderate



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KIA-NIRB-19

Review Comment Number	KIA-NIRB-19
Subject/Topic	Laboratory results for 2022 vs historical results
References	2022 Waste Rock and Ore Monitoring Report, Boston Camp Monitoring Requirements FINAL Sections 4.2.3 and 5.2.3
Summary	No hypothesis is given for the differences in water quality for either seepage or ephemeral streams compared with historical results.
Detailed Review Comment	A detailed summary is provided of the water quality for both seepage and ephemeral stream results. Comparisons are also made between 2022 results and historical results. Some parameters are substantially different i.e., orders of magnitude, yet no rationale or hypothesis is provided to explain why these differences have occurred.
Recommendation/Request	Please provide rationale or hypotheses that explain the differences in water quality for both seepage and ephemeral stream results between 2022 and historical.
Importance	Moderate

KIA-NIRB-20

Review Comment Number	KIA-NIRB-20
Subject/Topic	Sodium cyanide (NaCN) spill to water
References	Hope Bay Spill Contingency Plan. Appendix 1: Hazardous Materials and Product Specific Emergency Response Plans
Summary	The absence of a comprehensive spill contingency plan in the case of a NaCN spill to water is of concern.
Detailed Review Comment	<p>The emergency response for a NaCN spill to water is vague with respect to action that should be taken. For such a serious spill, actions should be decisive and detailed in order to avoid serious environmental and/or human impacts.</p> <p>Pump contaminated water to drums, tanks or lined containment berms if possible.</p> <p>Isolate/confine the spill by damming or diversion if feasible.</p> <ul style="list-style-type: none"> – Water treatment is only effective if it can be accomplished in conjunction with the spill. – Treatment chemicals (sodium or calcium hypochlorite) must not be added to surface waters (e.g., streams, lakes) as these are not generally effective and could result in additional environmental impacts.



	<p>– Hydrogen peroxide for treatment of solution spills or a sulfur dioxide/air process for treatment of slurry spills may be considered. This measure may only be used as a last resort if containment is not achievable and the spill can be treated directly at the point of release.</p> <p>The text addresses the response in terms of “if feasible” and stating that water treatment is effective only if it can be accomplished in conjunction with the spill. The text also states that treatment chemicals must not be added to surface waters, and they are not generally effective and could result in additional environmental impacts.</p> <p>No text is provided to indicate the steps that must be taken to avoid impacts.</p>
Recommendation/Request	Please provide a detailed emergency response plan for a spill to water of NaCN.
Importance	High

KIA-NIRB-21

Review Comment Number	KIA-NIRB-21
Subject/Topic	Inspection of water management ponds
References	Hope Bay Doris-Madrid Water Management Plan (Agnico, 2023) Inspection sub-headings Sections 3.2.1, 3.2.2, 3.2.3, 3.2.5, 3.2.10. Also, Section 4.2.1, 4.2.3, 4.2.4, 4.2.7
Summary	Frequency of inspection of the sedimentation pond, contact water ponds 1 and 2 and dewatering pipeline is not provided. Rather “regular” inspection” is proposed.
Detailed Review Comment	Regular inspection can include a range of frequencies. The text in these sections states that <i>“The containment berm should be inspected by the Site Services department on a regular basis to check for signs of seepage, erosion slumping or other sign of possible failure mechanisms. Regular inspection along the dewatering pipeline will be performed by the Site Services department to check for signs of leaks.”</i>
Recommendation/Request	More specific frequency of inspection should be identified for the sedimentation pond, contact water ponds 1 and 2, the tailings impoundment area and the freshwater intake. Frequency details are also required for the Madrid north contact water pond,



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	Madrid south primary and secondary contact water ponds and freshwater intake.
Importance	Moderate

KIA-NIRB-22

Review Comment Number	KIA-NIRB-22
Subject/Topic	Construction of south and west dams
References	Doris TIA Operations, Maintenance and Surveillance Manual (Agnico, 2023). Section 3.7 Construction Timing
Summary	Inconsistent text and figures regarding the construction of the south and west dams.
Detailed Review Comment	<p>Section 3.7 states that bulk fill of the Phase 1 portion of the South Dam was done during the late winter to spring of 2018. The Phase 2 bulk fill can now be completed during any season. Figure 2 shows Phase 2 of the south dam is not constructed. Figure 3 shows the dam as constructed.</p> <p>Section 3.7 also states that the west dam has yet to be built (as of 2021). Figure 2 shows this dam as not constructed. Figure 3 shows it as constructed.</p> <p>The information appears inconsistent and out of date.</p>
Recommendation/Request	Please update figures and text to present consistent and updated information as the date on this report is March 2023.
Importance	Low

KIA-NIRB-23

Review Comment Number	KIA-NIRB-23
Subject/Topic	Tailings Impoundment Area (TIA)
References	<p>3.1 CONSTRUCTION AND OPERATIONS</p> <p>Text: "The Saline Water Storage, a temporary structure, was built within the TIA limits to allow for segregation of underground water with high salinity and TIA water with low salinity."</p>
Summary	A temporary water filled portable dam has been constructed within the footprint of the approved TIA to divide saline water from freshwater within the TIA.
Detailed Review Comment	It is Palmer understanding that a temporary water filled portable dam has been installed in June 2022. The purpose of this temporary dam is to segregate fresh water from saline water. Please describe any monitoring system that will be in



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	place to identify any potential mixture between freshwater and saline water.
Recommendation/Request	Please describe management procedures in place to minimize the potential for saline water and freshwater intrusion, and to monitor any potential water flowing through the temporary dam.
Importance	Moderate

KIA-NIRB-24

Review Comment Number	KIA-NIRB-24
Subject/Topic	Tailings Impoundment Area
References	3.2 ROBERTS BAY DISCHARGE and Appendix G
Summary	In 2022, Agnico continued effluent discharge to Roberts Bay beginning on June 14, 2022 and throughout 2022. No non-compliances of the authorized limits set out in Schedule 4 of MDMER occurred in 2022.
Detailed Review Comment	Figure 2.2 indicates an increase in Salinity at RBD1 starting 2020 with several samples being above Toxicity Test Selection Threshold – Chronic. AGNICO should clarify the reason of the increase in Salinity at RBD1.
Recommendation/Request	AGNICO should investigate if the increase in salinity at RBD1 is related to the construction of the Saline Water Storage within the TIA.
Importance	Moderate

KIA-NIRB-25

Review Comment Number	KIA-NIRB-25
Subject/Topic	Hope Bay Projects – Doris and Madrid Water Management Plan
References	Throughout the document
Summary	The document does not acknowledge that TIA has been divided in two sections (fresh water and saline water), as described in Chapter 3 of the Annual Report.
Detailed Review Comment	The diagrams and the text throughout the document do not take into consideration that part of the TIA will be dedicated to the storage of underground water with high salinity, which will be separated from water with low salinity (fresh water). The two sections have temporarily divided by an interim berm and



	<p>the construction of long-term water separation within the TIA is underway.</p> <p>Considering that the TIA will be a two “stage” facility (saline water and fresh water), the water management plan should reflect this change in design for the TIA.</p>
Recommendation/Request	<p>AGNICO should review the water management plan to clearly identify the two sections (saline water and fresh water) of the TIA and specify, for each type of water (Contact Water, Mine water, Treated Water), in which section (saline water and fresh water) of the TIA will be initially discharged to.</p>
Importance	High

KIA-NIRB-26

Review Comment Number	KIA-NIRB-26
Subject/Topic	Exploration Drilling
References	3.3.1 Drilling
Summary	A total of 55,805 m in 211 underground diamond drillholes were completed in 2022. A total of 65 surface diamond drill holes totaling 52,865 m was completed in 2022.
Detailed Review Comment	AGNICO should clarify the source of the water used for drilling and under which water license and from which waterbodies it was withdrawn.
Recommendation/Request	Please indicate source of water and water license in the drilling section.



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Importance	Low
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KIA-NIRB-27

Review Comment Number	KIA-NIRB-27
Subject/Topic	Noise abatement - blasting
References	Section 6.1 Doris North Project Certificate No. 003 – Revised Term and Condition No. 29; Section 6.2 Madrid-Boston Project Certificate No. 009 – Revised Term and Condition No. 4 Table 8-1 Appendix D-3
Summary	The Proponent is required to develop and implement a noise abatement plan to protect people and wildlife from mine activity noise, including blasting. The proponent has identified sensitive fish Valued Ecosystem Components including arctic char, lake trout, lake whitefish, and ninespine stickleback and stated the noise abatement plan will consider potential blasting time restrictions with Fisheries and Oceans Canada's (DFO) Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters (Wright and Hopky 1998) as modified by DFO for use in the North. Table 8-1 also states a blasting monitoring program was developed and implemented that considers potential blasting time restrictions with Fisheries and Oceans Canada's (DFO) Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters (Wright and Hopky 1998) as modified by DFO for use in the North (see Revised Term and Condition 29).
Detailed Review Comment	Agnico states they do not maintain a standalone Noise Abatement Plan, but for the protection of wildlife, they implement noise management under a wildlife mitigation and monitoring program. The 2022 Wildlife Mitigation and Monitoring Program Compliance Report (Appendix D-3). This report contains noise mitigation and monitoring for blasting only for caribou. No setbacks are discussed regarding fish habitat.
Recommendation/Request	Provide a Noise Abatement plan, as per the condition, for fish habitat.
Importance	Moderate



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KIA-NIRB-28

Review Comment Number	KIA-NIRB-28
Subject/Topic	Lake levels
References	Section 6.1 Doris North Project Certificate No. 003 - Revised Term and Condition No. 36 Appendix D-4
Summary	The Proponent is required to continue year-round monitoring and recording of Doris Lake water levels during construction and operations. This information is provided in the 2022 Aquatic Effects Monitoring Program Report (Appendix D-4).
Detailed Review Comment	While the condition for Doris Lake seems to have been met, Table 3.1-1 of Appendix D-4 presents observed water level fluctuations for several other lakes in the Project area that are higher than baseline maximums. Several potential reasons for these exceedances are provided, including measurement error, incorrect methods, and smaller lakes freezing to or near the bottom. The final fish habitat summary states no detectable Project-related effects occurred to water levels, despite the previously presented water level findings. A statement is made that the open water results should be used (that showed no differences from baseline levels) instead of under ice measurements.
Recommendation/Request	Provide clarity on why current under ice measurement methods are being used if they are not a useful measure of lake levels, potential use of alternate methods, or elimination of this requirement. If the latter, proof that lake levels are not likely to be affected by the Project would be required.
Importance	Moderate

KIA-NIRB-29

Review Comment Number	KIA-NIRB-29
Subject/Topic	AEMP
References	Section 6.2 Madrid-Boston Project Certificate No. 009 – Revised Term and Condition No. 11 Appendix D-4
Summary	One term or condition for the AEMP is inclusion of details comparing the watershed features from the Aimaokatalok, Windy, and Doris watersheds to the reference watersheds.



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Detailed Review Comment	While many details are provided for the Windy and Doris watersheds, including comparisons with reference watersheds, the Aimaokatalok Watershed is only mentioned once in the AEMP. Aimaokatalok Lake was sampled, but no further information is provided, despite information in Table 8-2 of the Annual Report indicating lake levels and lake outflow were monitored and all were within natural variation.
Recommendation/Request	Provide the required information for the Aimaokatalok Watershed in the AEMP to back up statements made in the Annual Report.
Importance	Low

KIA-NIRB-30

Review Comment Number	KIA-NIRB-30
Subject/Topic	Blasting activities
References	Section 6.2 Madrid-Boston Project Certificate No. 009 – Revised Term and Condition No. 14
Summary	No project-specific thresholds, mitigation and monitoring requirements were developed or sought by the proponent from Fisheries and Oceans Canada for blasting activities in 2022.
Detailed Review Comment	Does the above statement mean no blasting occurred for the Project in 2022, or that no project-specific alterations in current setbacks from fish-bearing waters were not required due to modelled sound being below threshold levels?
Recommendation/Request	Provide clarity on the lack of project-specific thresholds, mitigation and monitoring requirements for blasting activities in 2022.
Importance	Low

KIA-NIRB-31

Review Comment Number	KIA-NIRB-31
Subject/Topic	BOS-8 sampling
References	Appendix D-5: 2022 Waste Rock and Ore Monitoring Report, Boston Camp
Summary	Sampling at BOS-8 entails collection of seepage from the camp pad and ore stockpile. The identifier BOS-8 includes sampling completed at four separate locations, labelled BOS-8A through BOS-8D. In 2022, samples were only collected at BOS-8A and



	BOS-AD, and data presentation does not differentiate between the two when discussing the potential for temporal trends.
Detailed Review Comment	<p>Sampling at BOS-8 entails collection of seepage from the camp pad and ore stockpile. The identifier “BOS-8” includes four separate sampling locations, labelled BOS-8A through BOS-8D, of which only BOS-8A and BOS-8D were sampled in 2022. No discussion was included as to of why BOS-8B and BOS 8C were not sampled.</p> <p>Section 4.2.3 describes data from BOS-8A and BOS-8D by comparing between the two stations and in relation to the historical dataset collected between 2008 and 2021. However, chemical differences between these two stations may exist such that comparison to all seepages at BOS-8 may not be appropriate. Further, the graphical presentation of the chemical trends (Figures 4-1 to 4 7) does not differentiate between sampling locations and uses a single symbol for the (collective) BOS-8 station. It is possible that seepage chemistry may differ between sampling locations whereby presentation of station-specific chemistry with time would provide a better visualization of the potential for temporal trends.</p>
Recommendation/Request	<p>KIA requests:</p> <ul style="list-style-type: none"> • A description as to why samples were not collected at BOS-8B and BOS 8C in 2022. • Chemical time-series graphs should use symbols/identifiers to allow the reader to assess trends on a station by-station basis. For the data presented in Figures 4-1 to 4-7 of Appendix D-5, a description of the potential presence/absence of station-specific trends from the BOS-8 dataset should be provided.
Importance	Moderate

KIA-NIRB-32

Review Comment Number	KIA-NIRB-32
Subject/Topic	Ephemeral Streams
References	Appendix D-5: 2022 Waste Rock and Ore Monitoring Report, Boston Camp
Summary	Samples collected from ephemeral streams are analyzed for dissolved metals (only) and results are compared to predictions from the 2009 water and load balance for Boston Camp (SRK Consulting (Canada) Inc. [SRK], July 2009) to assess the potential for impacts to Aimaokatalok Lake. This approach may



	underestimate the potential impacts of ephemeral drainages discharging to the nearby shoreline.
Detailed Review Comment	Samples collected from ephemeral streams are analyzed for dissolved metals and assessment for impacts are based on comparison to predictions from the 2009 water and load balance for Boston Camp (SRK, July 2009). The text does not discuss the rationale for the comparison of dissolved metals (instead of total metals) to the 2009 model predictions, which may be attributed to the development of geochemical source terms from laboratory test results that were provided for dissolved metals only. As total metal concentrations are generally similar or higher than dissolved concentrations, a comparison to total concentrations would be a better approach to assess environmental effects.
Recommendation/Request	KIA recommends total metals to be analyzed from ephemeral streams in addition to dissolved metals as most surface water quality aquatic life guidelines are provided for total metals values. KIA requests a description of the relevance of comparing 2009 model predictions of dissolved metals to measured dissolved (and not total) metals to assessing potential impacts to Aimaokatalok Lake from the camp pad.
Importance	Moderate

KIA-NIRB-33

Review Comment Number	KIA-NIRB-33
Subject/Topic	Ephemeral Streams
References	Appendix D-5: 2022 Waste Rock and Ore Monitoring Report, Boston Camp
Summary	Comparison of ephemeral stream chemistry to 2009 flow and load balance model predictions incorrectly states that no values are greater than predictions. The dissolved copper concentration from Station B2 (0.0023 mg/L) is higher than the average and maximum predicted dissolved copper value (of 0.002 mg/L).
Detailed Review Comment	Samples collected from ephemeral streams are analyzed for dissolved metals and assessment for impacts are based on comparison to predictions from the 2009 water and load balance for Boston Camp (SRK, July 2009). These results are shown in Table 5.4, whereby the dissolved copper concentration at Station B2 (0.0023 mg/L) is higher than the average and maximum predicted dissolved copper value (of 0.002 mg/L). Therefore, the statement in Section 5.2.4 of "All



	concentrations at all locations were within the range of predicted values.” does not accurately reflect the data presented.
Recommendation/Request	<p>KIA requests:</p> <ul style="list-style-type: none"> • The statement in Section 5.2.4 that “All concentrations at all locations where within the range of predicted values,” be revised if the presented dissolved copper value for Station B2 is accurate. If that value is not accurate, Table 5.4 should be updated. • Comment as to why 2009 model predictions for average and maximum dissolved copper concentrations at Station B2 are the same value (as shown in Table 5.4).
Importance	Moderate

KIA-NIRB-34

Review Comment Number	KIA-NIRB-34
Subject/Topic	Madrid portal saline seepage
References	Appendix E – 2022 Inuit Environmental Advisory Committee Meetings
Summary	The Inuit Environmental Advisory Committee (IEAC) raised questions and concerns that the saline seepage from the Madrid portal may be contaminated and may migrate towards Windy Lake. The response provided to the IEAC as part of those meetings was not wholly correct.
Detailed Review Comment	<p>Section 2.5 of the appendix describes the Madrid developments that were presented to the IEAC, which included the area outside of the existing Madrid portal and included seepage/water that damaged the surrounding flora. The IEAC had concerns about contaminated water and whether it could migrate towards Windy Lake. The authors commented that water testing indicated seepage “no longer has the high salt contents” and “water quality in Windy Lake does not show any sign of contamination”. The IEAC concern is also denoted as an Action Item in Section 2.5, whereby “water quality treatment results for the seepage monitoring, along with a memo on the existing Madrid portal site remediation” would be provided.</p> <p>While BGC agrees with the proposed Action Item, it is not clear what water testing the response referred to and, in reviewing seepage survey results provided in Appendix D-2: 2022 Waste Rock, Quarry and Tailings Monitoring Report, Doris and Madrid Mines, Hope Bay Project, a single sample (22 MAD 03) was collected near the Madrid portal (Figure 9-7) and proximal to</p>



	<p>the interpreted area of the damaged tundra. Results from that sample showed elevated chloride (310 mg/L), which was “notably higher...compared to the other seepage stations (maximum 65 mg/L)” (see Section 9.2.6 of Appendix D 2 - 2022 Waste Rock, Quarry and Tailings Monitoring Report, Doris and Madrid Mines, Hope Bay Project). As well, the same section describes the chemistry at 22-MAD-03 as having the “highest ammonia (3.1 mg/L)” and “notably high” concentrations of several dissolved metals (e.g., As, Co, Fe, Mn, Ni, Se, and Zn). Therefore, these results suggest the comment made to the IEAC may not have been wholly accurate or considering 2022 sample results.</p> <p>Furthermore, while sampling at Windy Lake does not show signs of contamination, the location of that sample is several kilometers north of the discharge location from the Madrid portal (see Figure 2.1-1 in Appendix D 4: 2022 Aquatic Effects Monitoring Report). Therefore, it may not be appropriate to use Windy Lake sample data to support the statement the lake chemistry has not been influenced by saline drainage from the Madrid portal area.</p>
Recommendation/Request	<p>KIA requests further comment on:</p> <ul style="list-style-type: none"> • The seepage data used to support their statement to the IEAC regarding lower salt contents. • What data from Windy Lake was used to support their statement made to the IEAC that no contamination signs were noted at Windy Lake. • KIA recommends the monitoring network for Windy Lake should be reviewed to assess if additional stations could be included to improve the assessment/monitoring of potential impacts from discharge/drainage from the Madrid North portal area.
Importance	High



Updated Management Plans and Doris TIA OM&S Manual

KIA-NIRB-35

Review Comment Number	KIA-NIRB-35
Subject/Topic	Saline Water Storage in Doris TIA
References	OM&S Manual: Hope Bay Doris Tailings Impoundment Area – Revision 6 (AEM, March 2023c).
Summary	<ul style="list-style-type: none"> A temporary storage facility for saline mine water is being constructed within the footprint of the Doris TIA to help water management within the TIA during the Care and Maintenance period. The facility was first constructed using an Aqua Dam and is now in the process of being replaced by an Interim Dike. The reference document notes on pg. 33; 'If saline water (such as from the underground) is deposited into the TIA then this should be preferential deposited towards the centre of the facility (i.e., away from the South Dam crest and upstream of the primary North Dam pond). The reference document also notes on page 38 that the Aqua Dam and Interim Dike are not classified as dams, as they are located entirely within the footprint of the existing TIA, and any loss of containment of the structures would pose no safety or environmental risk.
Detailed Review Comment	<p>There is no reference within the Doris TIA on the operational controls for the Aqua Dam or Interim Dike. For instance, there is no guidance on maximum water level to be retained by the Aqua Dam or Interim Dike, nor is there guidance on minimum beach length upstream of the South Dam. Additionally, while the reference document notes loss of containment of the Interim Dike would pose no safety or environmental risk, it may have an impact on the water level of the main reclaim pond retained by the North Dam.</p>
Recommendation/Request	<p>KIA requests further comment on:</p> <ul style="list-style-type: none"> Does the operation of the Interim Dike for the temporary storage of saline mine water comply with the guidance in the OM&S manual to deposit such water in the centre of the facility? What is the maximum water level upstream of the Interim Dike and what is the corresponding minimum beach length upstream of the South Dam?



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	<ul style="list-style-type: none"> • What would be the impact of a loss of containment of the Interim Dike under the maximum retained water level on the water level of the Reclaim pond? Are there any modifications to the FSL of the North Dam required while the Interim Dike is retaining water? • Should any of the information request above be included within the OM&S manual?
Importance	Moderate

Socio-Economic Monitoring Report

KIA-NIRB-36

Review Comment Number	KIA-NIRB-36
Subject/Topic	Percent of Inuit employees
References	Project Certificate Term and Condition no. 39 Hope Bay 2021 Socio-economic Monitoring Report
Summary	<p>Term and Condition no 39: "The Proponent, reflecting input from the Hope Bay Socio-Economic Working Group and the Kitikmeot Socio-economic Monitoring Committee, should include in its annual Hope Bay Socio-Economic Monitoring Plan report levels of Inuit employment at the Project as well as barriers and opportunities to achieving the high levels of employment described on page 2-137 of the Madrid Boston Project Final Environmental Impact Statement."</p> <p>Agnico Eagle reports:</p> <p><i>"there were 3 Kitikmeot Inuit in the Cambridge Bay Office and another 9 Inuit from elsewhere working at the Project. Inuit workforce represented 3% of total workforce in 2021"</i> (page 5)</p> <p><i>"Kitikmeot Inuit represented 1% of the workforce in 2021 while Inuit from elsewhere represented 2%"</i> (page 54)</p> <p><i>"in 2018 and 2019 workforce effort by Inuit was 10%"</i> (during operations) (page 54) bracketed text added</p>
Detailed Review Comment	<p>Although the FEIS recognizes that Inuit employment would drop during temporary closure, compared to operation, the FEIS predicts that the mine will reach the high Inuit hiring scenario of 30% during operations.</p> <p>We note that even during operations in 2018 and 2019 the mine fell well short of the predicted Inuit hiring scenario and dropped severely in 2021.</p>



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	<p>The barriers are noted as: limited access to appropriate housing, health services, childcare, postsecondary education, costly travel for training, the ability to take and pass trades entrance exams, passing pre-employment requirements such as medical testing and criminal record checks, and the fly in-fly-out rotational work schedule. (Page 57)</p> <p>Although Agnico Eagle indicates that it is engaging with KIA, the SEMWG and the Kitikmeot SEMC to collectively address these barriers, and supports the Kitikmeot Inuit Workforce Readiness and Success Initiative, opportunities to address the specific barriers are not identified.</p>
Recommendation/Request	KIA seeks more information specific opportunities that Agnico Eagle has identified in consultation with its partners to address the barriers to prepare itself to achieve the high hiring scenario predicted for the operations phase.
Importance	High

KIA-NIRB-37

Review Comment Number	KIA-NIRB-37
Subject/Topic	Percent of Inuit employees
References	Project Certificate Term and Condition no. 39 Hope Bay 2021 Socio-economic Monitoring Report
Summary	<p>Term and Condition no 39: <i>"The Proponent, reflecting input from the Hope Bay Socio-Economic Working Group and the Kitikmeot Socio-economic Monitoring Committee, should include in its annual Hope Bay Socio-Economic Monitoring Plan report levels of Inuit employment at the Project as well as barriers and opportunities to achieving the high levels of employment described on page 2-137 of the Madrid Boston Project Final Environmental Impact Statement."</i></p> <p>Agnico Eagle reports: <i>"Agnico Eagle is committed to ...recognizing Inuit skills and experiences equivalencies where appropriate... implementing employment policies to engage Inuit who do not have the education normally required for work at the Project, and employing Inuit college and university students as summer students"</i> (page 56)</p>
Detailed Review Comment	These IIBA commitments are very important to KIA. The report includes no tangible results from these commitments.
Recommendation/Request	KIA asks Agnico Eagle to report: 1) data for how it has recognized Inuit skills equivalencies, 2) employment policies



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	to engage Inuit who do not have the education normally required for work at the Project and 3) data on how many Inuit summer students are hired.
Importance	High

KIA-NIRB-38

Review Comment Number	KIA-NIRB-38
Subject/Topic	Obstacles for Inuit employees – women employees
References	Hope Bay 2021 Socio-economic Monitoring Report
Summary	<p>Agnico Eagle reports:</p> <p><i>“in 2021, women worked 88,246 hours representing 10% of total effort at the Project...and that pandemic site isolation has disproportionately affected [Inuit women].only 5 Inuit women continued to work for the Project due to Covid-19 isolation”</i> (page 57, 58)</p> <p><i>“ pre-employment raining with dedicated spots for female participation. The pre-employment training informs women on the availability of employment opportunities, provides career counselling, job search help, and employment skills workshops”</i> (page 58)</p> <p><i>“ensures that each new employee...has the right demeanour towards other co-workers and values Agnico’s culture of respect and inclusivity”</i> (page 58)</p> <p><i>“Enrollment in Northern Arctic College (NAC) is dominated by female students, with 81% of the total 744 students in 2019/2020 being female”. (page 72)</i></p>
Detailed Review Comment	KIA notes that only 5 Inuit women worked at the Project in 2021. KIA also notes 81 % of enrollment at NAC are female. This means that more females are eligible to work at the Project and increase the female work force.
Recommendation/Request	KIA would like to see continued dedicated spots for women in pre-employment training.
Importance	High

KIA-NIRB-39

Review Comment Number	KIA-NIRB-39
Subject/Topic	Obstacles for Inuit Employment – turn-over



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References	Project Certificate Term and Condition no. 39 Hope Bay 2021 Socio-economic Monitoring Report
Summary	Term and Condition no 39: <i>"The Proponent, reflecting input from the Hope Bay Socio-Economic Working Group and the Kitikmeot Socio-economic Monitoring Committee, should include in its annual Hope Bay Socio-Economic Monitoring Plan report levels of Inuit employment at the Project as well as barriers and opportunities to achieving the high levels of employment described on page 2-137 of the Madrid Boston Project Final Environmental Impact Statement."</i> Agnico Eagle reports: Turnover rate for Inuit employees is higher than for non-Inuit employees. Turnover rate of all employees varied from 17%-35% in the last 5 years at the Project, while for Inuit employees it varied from 29% to 105% (page 61)
Detailed Review Comment	KIA is concerned with the higher turn-over rate for Inuit employees. KIA notes that Agnico identifies programs and measures that help to reduce employee turn-over rate at page 61.
Recommendation/Request	KIA seeks information on the reasons for Inuit employees leaving the Project. Are they given exit interviews? What data is collected? How is Agnico Eagle addressing Inuit employment barriers that are identified in the interviews? How many Inuit employees are taking up each of the measures and programs listed?
Importance	High

KIA-NIRB-40

Review Comment Number	KIA-NIRB-40
Subject/Topic	Obstacles for Inuit Employment - training
References	Project Certificate Term and Condition no. 39 Hope Bay 2021 Socio-economic Monitoring Report
Summary	Term and Condition no 39: "The Proponent, reflecting input from the Hope Bay Socio-Economic Working Group and the Kitikmeot Socio-economic Monitoring Committee, should include in its annual Hope Bay Socio-Economic Monitoring Plan report levels of Inuit employment at the Project as well



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	<p>as barriers and opportunities to achieving the high levels of employment described on page 2-137 of the Madrid Boston Project Final Environmental Impact Statement.”</p> <p>Agnico Eagle reports:</p> <p>In 2021, 120 hours of training was delivered to Inuit employees (representing 1.7% of the total effort). Training included rigging, rimpull mine rescue, haul truck, bear awareness and cat skidsteer. (Page 64)</p> <p>Inuit are underrepresented in professional and management positions. Agnico is committed to encouraging Inuit to advance to managerial positions through training and skills development and encouraging Inuit to achieve the education and qualifications needed for employment and advancement at the Project. (Page 68)</p>
Detailed Review Comment	<p>KIA is concerned with the very low amount of training for Inuit employees.</p> <p>KIA is also concerned that there was no professional and management related training, even though Agnico states that its commitment to training and skills development to advance Inuit to managerial positions</p>
Recommendation/Request	<p>KIA is recommending more training for Inuit employees and in particular for professional and management related opportunities.</p> <p>What is Agnico Eagle doing to meet its stated commitment to train Inuit for managerial positions? How much resources are being directed to this program?</p>
Importance	High



Appendix A: Project Certificate 009

Terrestrial Environment Commitments

KIA-Commitment 1

Review Comment Number	KIA-Commitment 1
Commitment Number 1	<p>Subject: Vegetation sampling for food chain model</p> <p>Commitment: TMAC will speak with the KIA prior to the hearings to come to agreement as to where sedge samples can be collected for baseline purposes. Based on a meeting on April 30, 2018, it was agreed to collect a baseline of 30 samples at Boston and 30 samples at the Tailings Impoundment Area and additional samples at reference sites. TMAC will produce a sampling plan for review by the KIA prior to construction.</p> <p>Project Phase/Timing: Prior to Construction</p>
<p>References (Report, Section, Page)</p>	<p>NIRB Project Certificate No. 009</p> <ul style="list-style-type: none"> Appendix B, Commitment No. 1 (p. 40) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 1, KIA-FEIS-03 (p. 92) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix C-1, KIA-FEIS-03 (p. 1) Table 8-2 (p. 8-15) Appendix D-3, Table 1 (p. viii), Section 3.13 (p. 3-71) <p>TMAC Resources Doris and Madrid-Boston Projects, 2018 Wildlife Mitigation and Monitoring Plan Compliance Report</p> <ul style="list-style-type: none"> Section 5.2.1 (p. 5-1), Section 5.3.1 (p. 5-2) <p>Appendix 2.2-1, Appendix 5.2-1</p>
<p>Proponent's Compliance Status (From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Completed in collaboration with input from the KIA. See the 2018 Wildlife Mitigation and Monitoring Report submitted March 28, 2019, Sections 5.2.1 and 5.3.1.</p>
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	TMAC completed a sedge sampling program in 2018 following a request from the KIA to generate an understanding of the baseline tissue metal concentrations in sedges (2018 WMMP



	<p>Report, Section 5.2.1). TMAC explained that sedge samples were collected at 30 locations, which “<i>was reduced from the FEIS hearing commitment (Table 5.1-1) in agreement with the KIA</i>” (2018 WMMP Report, Section 5.3.1). The 2018 Sedge Sampling Plan was also provided as Appendix 5.2-1 in the 2018 WMMP Report.</p> <p>In the 2021 NIRB Annual Report and 2021 WMMP Compliance Report, AEM reiterates that a sedge sampling program was implemented in 2018. The program has not been repeated since; however, AEM states that additional data collection will be discussed when operations of the Madrid and Boston areas is underway. The sedge sampling program should be repeated as required based on dustfall triggers, and the KIA will continue to monitor this commitment going forward.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please resume collaborative efforts with the KIA to discuss the study design for additional sedge sampling prior to construction of the Madrid-Boston All Weather Road and the Boston Project area. <p>Continue to report on dustfall triggers (see Commitment No. 3) that could trigger the need for repeated sampling.</p>
Importance	High

KIA-Commitment 2

Review Comment Number	KIA-Commitment 2
Commitment Number 2	<p>Subject: Noise Effects Significance</p> <p>Commitment: TMAC will abide by occupational health and safety regulations, and provide our workers with a safe work environment, including work camp accommodation areas.</p>
References (Report, Section, Page)	
Proponent’s Compliance Status (From 2021 Annual Report)	AEM’s 2021 Self-Reported Status: Unknown.
Summary	This commitment was not formally reviewed by KIA consultants. KIA believes that AEM follows standard, prescribed occupational health and safety regulations, and provide workers with a safe work environment and camp.



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Detailed Review Comment	No comment
Recommendation/Request	KIA requests AEM to provide to NIRB evidence of compliance with health and safety regulations in regard to noise.
Importance	Low

KIA-Commitment 3

Review Comment Number	KIA-Commitment 3
Commitment Number 3	<p>Subject: Effects of road dust on vegetation communities</p> <p>Commitment: TMAC commits to conduct vegetation monitoring if the results of dust fall monitoring indicate that there is the potential for effects on tundra vegetation beyond that predicted in the PDA.</p> <p>Project Phase/Timing: All phases</p>
References (Report, Section, Page)	<p>NIRB Project Certificate No. 009</p> <ul style="list-style-type: none"> Appendix B, Commitment No. 3 (p. 40) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 3, KIA-NIRB09 (p. 92) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix C-1, KIA-NIRB-09 (p. 1) Table 8-2 (p. 8-14) <p>Appendix D-1</p>
Proponent's Compliance Status (From 2021 Annual Report)	<p>AEM's 2021 Self-Reported Status: No action required at this time.</p>
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	As reported in the 2021 NIRB Annual Report, AEM conducted dustfall monitoring using snow core sampling and canisters and at Doris and Madrid, and measured TSP, PM ₁₀ , and PM _{2.5} using partisol samplers at Doris between January and September 2021. Although there were two exceedances of the ambient air quality objective for residential areas, values were well below the objective for industrial and commercial sites. Three dustfall measurements also exceeded FEIS predictions for maximum dustfall; however, AEM reported that these values remained "consistent with predictions in



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	closer proximity to the TIA” and “within the expected range of variability for the dispersion modelling predictions”. Overall, the air quality compliance monitoring results for Q1-Q3 were deemed satisfactory by the contractor (Nunami Stantec Ltd.). Based on these results, the need for vegetation monitoring (to meet this Commitment) has not been triggered.
Recommendation/Request	The KIA recommends continued reporting on dustfall measurements and triggers that have or have not triggered additional vegetation monitoring.
Importance	N/A

KIA-Commitment 4

Review Comment Number	KIA-Commitment 4
Commitment Number 4	<p>Subject: Invasive Plant Management</p> <p>Commitment: TMAC commits to including a section in the Wildlife Mitigation and Monitoring Plan (WMMP) on invasive plant species detection and management, and report in the annual compliance report.</p> <p>Project Phase/Timing: Prior to Project Commencement; annually thereafter</p>
<p>References</p> <p>(Report, Section, Page)</p>	<p>NIRB Project Certificate No. 009</p> <ul style="list-style-type: none"> Appendix B, Commitment No. 4 (p. 41) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 4, KIA-NIRB-10 (pp. 92-93) Table 3, KIA-NIRB-06 (pp. 11-12) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix C-1, KIA-NIRB-10 (p. 1) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 2.11.1 (pp. 15-16), Section 3.1.14 (p. 25)</p>
<p>Proponent’s Compliance Status</p> <p>(From 2021 Annual Report)</p>	<p>AEM’s 2021 Self-Reported Status: The WMMP (April 2021) provides an overview of invasive plant species management and reporting.</p>
Summary	The KIA <i>disagrees</i> with AEM’s “Active, In Compliance” status for work completed to date.



<p>Detailed Review Comment</p>	<p>Although AEM technically has a section on Invasive Plants in the 2021 WMMP, Section 2.11.1, the content is limited to the following:</p> <p><i>“Mitigation designed to reduce the chance of introducing invasive plant species introduced through Project activities, includes:</i></p> <ul style="list-style-type: none"> <i>• Preventing the introduction and establishment of invasive plant species by ensuring vehicles brought to site are clean.</i> <i>• Invasive plant species observed will be reported to the GN DOE.”</i> <p>In addition, AEM only has a single sentence in the Monitoring section for Plants (Section 3.1.14) – <i>“Loss of habitat within Project footprints resulting from construction activities will be tracked and summarized in comparison to impacts predictions (as per Section 3.1.1).”</i> – and there is no mention of invasive species.</p> <p>Further details are needed to ensure that invasive plant detection and management are properly planned and implemented. For example, AEM should provide information about the locations and frequency of surveys (e.g., prior to ground clearing and as part of revegetation monitoring), qualifications/training of staff to conduct surveys, and management and disposal methods if invasive plants are found (e.g., following advice from GN DOE).</p> <p>The KIA also notes that the AEM did not report on invasive plants in the 2021 WMMP Compliance Report (as per this Commitment), as noted in our review comment KIA-NIRB-06. AEM responded that invasive plant monitoring was not conducted in 2021, but that an invasive plant survey will be conducted in 2023 and will be reported in the 2023 WMMP Report in March 2024.</p>
<p>Recommendation/Request</p>	<p>The KIA requests/recommends the following:</p> <p>Please update the Hope Bay WMMP to include more information on invasive plant detection, management, and monitoring.</p>
<p>Importance</p>	<p>Moderate</p>



KIA-Commitment 5

Review Comment Number	KIA-Commitment 5
Commitment Number 5	<p>Subject: Road effects and traffic management for wildlife VECs</p> <p>Commitment: TMAC will quantify road traffic as a number of vehicle passes per day throughout a year on the two main segments of the road (Doris to Madrid and Madrid to Boston) and report annually in the WMMP compliance report.</p> <p>Project Phase/Timing: All phases; year-round</p>
References (Report, Section, Page)	<p>NIRB Project Certificate No. 009</p> <ul style="list-style-type: none"> Appendix B, Commitment No. 5 (p. 41) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 5, KIA-FEIS-11 (p. 93) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix C-1, KIA-FEIS-11 (p. 1) Appendix D-3, Table 1 (p. ii) and Section 2.2 <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 3.1.5.1 (p. 19)</p>
Proponent's Compliance Status (From 2021 Annual Report)	<p>AEM's 2021 Self-Reported Status: Monitoring for (Doris to Madrid) traffic is included in the WMMP (April 2021) and reported in the WMMP Report (2021).</p> <p>NIRB Notes: As the road between Madrid and Boston has not been constructed, the information is not required yet.</p>
Summary	The KIA partially agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Section 3.1.5.1 of the 2021 WMMP outlines Road Traffic monitoring for the Hope Bay Project:</p> <p><i>"Traffic monitoring will track the volume and composition of light-weight vehicles (e.g., pickup trucks) and heavy equipment (e.g., haul trucks and other heavy equipment) on Project roads, summarizing the information seasonally and annually. Vehicle traffic on Project roads will be monitored using cameras and records of haul truck trips from Nuna Logistics. The data will be</i></p>



	<p><i>used to determine monthly traffic volumes throughout the year for the two vehicle classes on each Project Road segment.</i></p> <p><i>These traffic data will be compared against FEIS traffic predictions (TMAC 2017). If traffic rates exceed those in the FEIS by 25% in two consecutive monitoring periods, a revised assessment of potential impacts of traffic on wildlife will be conducted."</i></p> <p>Road traffic monitoring results reported in the 2021 WMMP Compliance Report included data for the Project roads from Doris to Madrid North Road, Roberts Bay to Doris/Madrid North, and Windy Lake to Doris. AEM monitors and reports on road traffic using two methods:</p> <ol style="list-style-type: none"> 1. Haul logs summarized as maximum, minimum, and average monthly transits. 2. Data from two wildlife cameras summarized as daily average traffic volumes during key seasons for caribou (December/January = winter, May = spring migration, July = post-calving/summer). <p>In the 2021 WMMP Compliance Report, Table 1, AEM explains that traffic levels between Roberts Bay, Doris, Madrid North, and Windy Lake were 37-100% of the predicted maximum levels in the Madrid-Boston FEIS, and states that the conclusions of the FEIS remain valid.</p> <p>However, Table 2.2-3 shows that the daily average vehicle traffic in May 2021 on the road from Roberts Bay to Doris/Madrid North was 28.0 transits, which is 40% higher than the FEIS prediction of 20 peak daily transits. According to the 2021 WMMP, if the next monitoring period also shows >25% exceedance of road traffic levels, a revised assessment of potential impacts of traffic on wildlife will be conducted. It is unclear whether AEM considers the next monitoring period for the wildlife camera-based traffic monitoring to be July 2021 (the subsequent key caribou season) when the daily average vehicle traffic was 16.8 transits. It is also unclear why camera-based monitoring data are not presented with maximum and minimum values similar to the haul logs since the FEIS comparator values are intended to be maximum predicted daily transits. If the daily average traffic level in May 2021 already exceeded the maximum FEIS predicted value, there is likely a far greater exceedance for the maximum traffic</p>
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	<p>level from Roberts Bay to Doris/Madrid North, and these exceedances may have continued in June 2021.</p> <p>Overall, it is difficult to determine whether AEM is compliant with this Commitment and their road traffic monitoring plan in the WMMP because the methods are not clearly explained with supporting rationale, and the results are not presented in a manner that allows appropriate comparison with FEIS predictions.</p> <p>Finally, AEM notes in the 2021 WMMP Compliance Report that <i>“Transits between Roberts Bay and Doris moved supplies from the sealift to the mine site, but there were no hauling trips or haul logs.”</i> It is important that Project staff be instructed and reminded to record hauling trips.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please clarify what “consecutive monitoring periods” mean with respect to the Road Traffic Monitoring program as described in the 2021 WMMP and WMMP Compliance Report. Since the wildlife cameras are continuously operating, a more conservative approach would be to assign the next month as the subsequent monitoring period. • Please include the maximum (and minimum) daily transits for the wildlife camera-based road traffic monitoring data, as the maximum values should be compared against the FEIS predictions, rather than daily averages. <p>Please remind Project staff to complete their hauling traffic logs.</p>
Importance	High

KIA-Commitment 6

Review Comment Number	KIA-Commitment 6
Commitment Number 6	<p>Subject: Road effects and traffic management for wildlife VECs</p> <p>Commitment: TMAC will consider the traffic levels, observed effects to large mammals, and reflect on adaptive management options in consultation with the IEAC.</p> <p>Project Phase/Timing: All phases; year-round</p>
References	NIRB Project Certificate No. 009



(Report, Section, Page)	<ul style="list-style-type: none"> Appendix B, Commitment No. 6 (p. 41) NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) Appendix B, Phase 2 Commitment 6, KIA-FEIS-11 (p. 93) Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022) Appendix C-1, KIA-FEIS-11 (p. 1) Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021) <p>Section 3.1.5.1 (p. 19)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: To be considered in the future as operational plans at Madrid and/or Boston develop.
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Although this Commitment was presented as part of the Final Hearing for the Phase 2 project, the KIA disagrees that the Commitment should only be considered as operational plans at Madrid and/or Boston develop. As discussed in Error! Reference source not found., AEM has a Road Traffic monitoring plan in place as part of the WMMP, including a trigger for re-assessment: " <i>If traffic rates exceed those in the FEIS by 25% in two consecutive monitoring periods, a revised assessment of potential impacts of traffic on wildlife will be conducted.</i> " The missing pieces in Section 3.1.5.1 of the 2021 WMMP are commitments to undertake adaptive management (not just a revised impact assessment) and to consult the IEAC when deciding on additional mitigation measures that could be applied.
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <p>Please commit to consultation with the IEAC if adaptive management options are needed to mitigate traffic impacts on large mammals.</p>
Importance	High

KIA-Commitment 7

Review Comment Number	KIA-Commitment 7
Commitment Number 7	Subject: Migratory stand watch methods and results



	<p>Commitment: TMAC commits to conducting additional migration surveys at the proposed wind turbine pad locations prior to construction (for baseline purposes), and during the appropriate survey time period to meet ECCC (2017) guidance and to capture peak migratory activity for raptors, waterbirds, and upland birds.</p> <p>Project Phase/Timing: Prior to Construction</p>
<p>References (Report, Section, Page)</p>	<p>NIRB Project Certificate No. 009</p> <ul style="list-style-type: none"> Appendix B, Commitment No. 7 (p. 41) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 7, KIA-FEIS-12 (p. 93) Table 3, KIA-NIRB-04 (p. 11) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix C-1, KIA-FEIS-12 (p. 1) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <p>KIA-NIRB-4 (p. 42)</p>
<p>Proponent's Compliance Status (From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: No turbines will be constructed in 2021. Baseline work will be conducted prior to construction of turbines.</p>
<p>Summary</p>	<p>The KIA <i>agrees</i> with AEM's "Not Active Yet, Not Yet Applicable" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>AEM responded to our 2021 NIRB Annual Report review comment KIA-NIRB-04 that "<i>Construction of wind turbines are no longer part of the 2022 workplan... The placement location of the wind turbines has not yet been finalized and additional baseline surveys will be completed when the locations are finalized... Baseline surveys include spring and fall migration monitoring at the wind turbine locations, as part of Certificate No. 009 Commitment #7.</i>"</p> <p>It is expected that baseline surveys to be planned and conducted in the future (when there are definite plans for wind turbines) will comply with this Commitment.</p>
<p>Recommendation/Request</p>	<ul style="list-style-type: none"> The KIA requests/recommends the following: Please ensure that future planned baseline surveys for wind turbines follow the guidance provided in ECCC (2017).



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	Please allow the KIA to review the migration survey plan prior to implementation.
Importance	High

KIA-Commitment 8

Review Comment Number	KIA-Commitment 8
Commitment Number 8	<p>Subject: Migratory stand watch methods and results</p> <p>Commitment: TMAC commits to designing the transmission line to meet the Edison Institute guidelines for reducing bird mortalities and line strikes.</p> <p>Project Phase/Timing: Prior to Construction</p>
<p>References</p> <p>(Report, Section, Page)</p>	<p>NIRB Project Certificate No. 009</p> <ul style="list-style-type: none"> Appendix B, Commitment No. 8 (p. 41) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 8, KIA-FEIS-12 (p. 93) Table 3, KIA-NIRB-04 (p. 11) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix C-1, KIA-FEIS-12 (p. 1) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <p>KIA-NIRB-4 (p. 42)</p>
<p>Proponent's Compliance Status</p> <p>(From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Noted.</p>
Summary	The KIA <i>agrees</i> with AEM's "Not Active Yet, Not Yet Applicable" status for work completed to date.
Detailed Review Comment	<p>Please see detailed review comment for Error! Reference source not found. above. As there is currently no definite plan or timeline for wind turbine and transmission line construction, this Commitment is not yet applicable.</p> <p>However, it is expected that the future transmission line will comply with this Commitment.</p>
Recommendation/Request	The KIA requests/recommends the following:



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	Please ensure that the future transmission line is constructed following best practices for reducing bird strikes and mortality.
Importance	High

KIA-Commitment 9

Review Comment Number	KIA-Commitment 9
Commitment Number 9	<p>Subject: Habitat suitability mapping for furbearers (wolverine)</p> <p>Commitment: TMAC commits to using the habitat maps that use Terrestrial Ecosystem Mapping for wildlife management purposes and when reporting habitat loss in the annual WMMP report.</p> <p>Project Phase/Timing: All phases; annually</p>
References (Report, Section, Page)	<p>NIRB Project Certificate No. 009</p> <ul style="list-style-type: none"> Appendix B, Commitment No. 9 (p. 41) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 9, KIA-FEIS-13 (p. 94) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix C-1, KIA-FEIS-13 (p. 1) Appendix D-3, Section 2.1 (pp. 2-1 to 2-6) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 2.4 (p. 12), Section 3.1.1 (p. 17)</p>
Proponent's Compliance Status (From 2021 Annual Report)	<p>AEM's 2021 Self-Reported Status: The use of Terrestrial Ecosystem maps to report Habitat Loss is included in the WMMP (April 2021) and reported in the WMMP Report (2021).</p>
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	We appreciate that AEM continues to use Terrestrial Ecosystem Mapping to evaluate loss of suitable habitat for multiple wildlife VECs, including caribou, grizzly bear, muskox, wolverine, short-eared owl, waterbirds, and upland birds (2021 WMMP Compliance Report, Table 2.1-1).



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Recommendation/Request	N/A
Importance	N/A

KIA-Commitment 10

Review Comment Number	KIA-Commitment 10
Commitment Number 10	Commitment: TMAC will work with DFO, the KIA, and Inuit Environmental Advisory Committee to identify candidate offsetting options with a preference for developing a community-based offsetting program located near Cambridge Bay.
References (Report, Section, Page)	Hope Bay Project 2020 Nunavut Impact Review Board Annual Report; Hope Bay Project 2021 Nunavut Impact Review Board Annual Report; Hope Bay Project 2022 Nunavut Impact Review Board Annual Report;
Proponent's Compliance Status (From 2021 Annual Report)	The 2020, 2021, and 2022 annual reports to NIRB all indicate consultation occurred with communities and the Inuit Environmental Advisory Committee (IEAC) regarding fisheries offsetting. The 2022 Annual Report indicates Agnico continued to make use of the Hope Bay Inuit Environmental Advisory Committee (IEAC) in 2022. The IEAC met once in 2022 to provide Agnico and the KIA with advice on fisheries offsetting and the design of planned wildlife height of land and track surveys.
Summary	The KIA agrees AEM is currently in general compliance with this commitment.
Detailed Review Comment	The 2022 Annual Report explicitly states consultation has occurred with the Inuit Environmental Advisory Committee on potential fisheries offsets, although there is no record of ongoing consultation with the KIA or DFO, which also is required.
Recommendation/Request	The KIA requests that AEM confirm consultation has occurred with the KIA and DFO on potential fisheries offset sites and designs.
Importance	Moderate



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KIA-Commitment 11

Review Comment Number	KIA-Commitment 11
Commitment Number 11	Commitment: TMAC will undertake field surveys in summer 2018 to ground-truth preliminary offsetting site options, and refine objectives, constraints, and opportunities associated with each site. These activities will contribute to preliminary gain calculations in support of the development of a Fisheries Offsetting Plan.
References (Report, Section, Page)	Hope Bay Project 2018 Nunavut Impact Review Board Annual Report; Hope Bay Project 2019 Nunavut Impact Review Board Annual Report; Hope Bay Project 2020 Nunavut Impact Review Board Annual Report; Hope Bay Project 2021 Nunavut Impact Review Board Annual Report; Hope Bay Project 2022 Nunavut Impact Review Board Annual Report; Appendix D-4 Hope Bay Project: 2022 Aquatic Effects Monitoring Program Report (p. 3-1)
Proponent's Compliance Status (From 2021 Annual Report)	<p>There is no indication in the 2018 or 2020 annual reports to NIRB that field studies on potential offsetting sites took place.</p> <p>The 2019 Annual Report to NIRB indicates staff assisted ERM contract biologists to perform Freshwater Creek fisheries offsetting research, but no methods of results are presented.</p> <p>The 2021 Annual Report to NIRB indicates CSR staff supported contracted hydrology and fisheries research field work investigating water flow and fish passage on the east channel of Freshwater Creek adjacent to Cambridge Bay in order to support future Fisheries Offsetting proposals to the Department of Fisheries and Oceans.</p> <p>The 2022 Annual Report indicates staff provided support to hydrology consultants undertaking studies on the Freshwater Creek drainage system as part of efforts to design a fisheries offsetting or compensation program on this waterbody. This work included involving local guides and a site visit by the IEAC.</p> <p>AEM states in the 2022 AEMP (p. 3-1) that if habitat loss is anticipated to occur as a consequence of Project-related</p>



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	activities, fisheries offsetting under applicable <i>Fisheries Act</i> Authorizations may be sought to compensate for the loss of fish habitat.
Summary	The KIA believe AEM may be in compliance with this commitment due to some field studies having taken place, however, information on this work currently is lacking.
Detailed Review Comment	<p>The current degree of biological and hydrological data obtained for the fisheries offsetting sites is unknown. These field data are required to develop detailed offsetting designs for the Fisheries Offsetting Plan.</p> <p>It is concerning the 2022 Annual report still indicates habitat loss may occur, when accounting for freshwater and marine habitat losses already has been detailed.</p>
Recommendation/Request	The KIA requests that AEM confirm ground-truthing of preliminary offsetting site options has occurred, and the objectives, constraints, and opportunities associated with each site have been characterized. This information is required for detailed design of fisheries offsets.
Importance	High

KIA-Commitment 12

Review Comment Number	KIA-Commitment 12
Commitment Number 12	Commitment: TMAC will apply adaptive management processes during monitoring. Should a high groundwater sensitivity case result in habitat losses that exceed those predicted for the base case, TMAC would apply an offsetting plan (as required by DFO) that is commensurate with these losses.
References (Report, Section, Page)	Hope Bay Project 2022 Nunavut Impact Review Board Annual Report; Appendix D-4 Hope Bay Project: 2022 Aquatic Effects Monitoring Program Report (Table 2.1-1).
Proponent's Compliance Status (From 2021 Annual Report)	The AEMP indicates surface water sampling sites are located at eight lakes in the project area to measure potential drawdown effects due to groundwater mine pit inflows and water withdrawal for mine processes. The Response Framework links the results of the AEMP effects analysis to management actions to avoid significant adverse effects arising from Project activities.



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Summary	The KIA agrees AEM is currently in compliance with the monitoring plan commitment, however, no offsetting plan has been presented.
Detailed Review Comment	The required monitoring for potential Project effects due to issues with groundwater flows, and an adaptive management process have been developed by AEM. The required Fisheries Offsetting Plan is still outstanding.
Recommendation/Request	The KIA requests that AEM develop a Fisheries Offsetting Plan.
Importance	Moderate

KIA-Commitment 13

Review Comment Number	KIA-Commitment 13
Commitment Number 13	Commitment Monitor potential changes to arsenic in the Project lakes through the AEMP instead of what was proposed during the assessment of the Project.
References (Report, Section, Page)	NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 1, KIA-NIRB-13 (p. 98) Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022) Appendix D-4 Hope Bay Project: 2021 Aquatic Effects Monitoring Program Report
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2022 Self-Reported Status: Agnico Eagle indicated that arsenic is included as one of the water quality parameters to be monitored in the approved Hope Bay Project: Aquatic Effects Monitoring Plan (the Plan; TMAC2018). As stated in the Plan (Table 4.4-1), the CCME arsenic guideline of 0.005 mg/L will be used as a water quality benchmark or effects monitoring.
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	The 2021 AEMP includes arsenic and references the CCME guideline as a potential effects threshold.
Recommendation/Request	N/A
Importance	N/A



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KIA-Commitment 14

Review Comment Number	KIA-Commitment 14
Commitment Number 14	Commitment: TMAC agrees to add free cyanide which has a CCME water quality guideline of 0.005 mg/L and total cyanide to the AEMP parameter suite for Aimaokatalok Lake and Reference Lake B.
References (Report, Section, Page)	<p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix B, Phase 2 Commitment 1, KIA-NIRB-14 (p. 98) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <p>Appendix D-4 Hope Bay Project: 2021 Aquatic Effects Monitoring Program Report</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2022 Self-Reported Status: "As stated in the approved Hope Bay Project: Aquatic Effects Monitoring Plan (Section 3.2-2; TMAC 2018), total and free cyanide will be monitored in the referenced lakes."
Summary	The KIA <i>disagrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	The 2021 AEMP report does not appear to include total or free cyanide in the reported results.
Recommendation/Request	The KIA requests/recommends that AEM confirm that free cyanide continues to be included in the AEMP at all sites, and particularly for Aimaokatalok Lake and Reference Lake B
Importance	Moderate



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Appendix B: Project Certificate 003

Water Quality Commitments

KIA-Commitment-TSS 1

Review Comment Number	Installing silt curtains in localized areas of permafrost degradation;
References (Report, Section, Page)	<p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, Water Quality – TSS Commitment 1 (P45) Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022) Table 8-1. Summary of Post Environmental Assessment Monitoring Program under Project Certificate No. 003 Hope Bay Project 2020 Nunavut Impact Review Board Annual Report (April 2021) <p>Hope Bay Project Doris and Madrid Water Management Plan (March 2022)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active in Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	AEM has indicated that silt fencing is employed to protect against erosion impacting local waterbodies where necessary. AEM has not however specifically indicated whether silt curtains are used when elevated total suspended solids are encountered as a result of permafrost degradation. However, we acknowledge deployment of silt (or sediment/turbidity) curtains is a standard practice for most proponents when a sediment or silt plume is observed; AEM may simply not have specified this practice in the 2021 annual reporting documents.
Recommendation/Request	AEM to provide documentation that silt curtains are deployed as a standard practice when permafrost degradation is observed. Please provide further documentation that silt curtain have been deployed when localized permafrost degradation has occurred and elevated sedimentation is observed to support AEM's "Active, In Compliance" status.



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Importance	Moderate
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KIA-Commitment-TSS 2

Review Comment Number	Applying geo-textile materials or rip rap to areas where slumping is observed to stabilize the shoreline.
References (Report, Section, Page)	<p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, Water Quality – TSS Commitment 2 (P45) Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022) Table 8-1. Summary of Post Environmental Assessment Monitoring Program under Project Certificate No. 003 Hope Bay Project 2020 Nunavut Impact Review Board Annual Report (April 2021) <p>Hope Bay Project Doris and Madrid Water Management Plan (March 2022)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active in Compliance
Summary	The KIA disagrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	No evidence was found that geo-textile materials or rip rap have been applied to areas where slumping is observed to stabilize the shoreline.
Recommendation/Request	AEM to direct reviewers to documentation that geo-textile materials or rip rap are routinely applied to locations where slumping is observed to stabilize the shoreline.
Importance	Low

KIA-Commitment-Runoff 3

Review Comment Number	Identifying and using quarry rock that has a low acid generation and metal leaching potential;
References (Report, Section, Page)	<p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, Water Quality – Runoff Commitment 3 (P45)



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	Hope Bay Project Quarry Management Plan (March 2022)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active in Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	AEM indicates within the Quarry Management Plan that only low acid generation and metal leaching potential material will be used. <i>"The geochemical assessment of the proposed Madrid-Boston Project quarries (Table 1.2) was based on results of the 2011 quarry geochemical characterization program and/or a comparison to the existing quarry rock data set in the context of regional belt-wide geology."</i> (Quarry Management Plan p12/34).
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Runoff 4

Review Comment Number	Implementing industry best practice methods for explosives use, which will limit residual nitrite and nitrate present in quarried and waste rock;
References (Report, Section, Page)	NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) <ul style="list-style-type: none">Appendix A, Water Quality – Runoff Commitment 4 (P45) Hope Bay Project Explosives Management Plan (December 2017) Appendix G – 2022 Geochemical Source Investigation Section 4.3 Ammonia, Nitrate, and Nitrite (April 2023)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active in Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	AEM currently adheres to the Explosives Management Plan. While nitrogen species are detected in the Tailings Impoundment Area, the concentrations observed are not consistent with ongoing issues with ongoing significant improper blasting practices.



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Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Runoff 5

Review Comment Number	Completing winter construction of the roads and building pads, which will mitigate the risk of sediment release during construction; and
References (Report, Section, Page)	NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) <ul style="list-style-type: none">Appendix A, Water Quality – Runoff Commitment 5 (P46) Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022) Table 8-1. Summary of Post Environmental Assessment Monitoring Program under Project Certificate No. 003
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active in Compliance
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	AEM indicates that construction of roads and building pads are generally completed in winter months.
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Runoff 6

Review Comment Number	Implementing industry best practices for sediment control and storm water management during and after construction to collect surface runoff, and discharging runoff to the tailings containment area, where the sediments would have the opportunity to settle out.
References (Report, Section, Page)	NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) <ul style="list-style-type: none">Appendix A, Water Quality – Runoff Commitment 5 (P46) Hope Bay Project Doris and Madrid Water Management Plan (March 2022)



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Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Section 5.2 Erosion Management and Mitigation Measures of the current Water Management Plan provides high level best practices that are implemented to minimize erosion and the mobilization of sediment.
Recommendation/Request	N/A
Importance	N/A

Permafrost Commitments

KIA-Commitment-Permafrost 1

Review Comment Number	Permafrost #1: Additional thermistors will be installed during construction.
References (Report, Section, Page)	<ul style="list-style-type: none"> • NIRB Final Hearing Report for the Doris North Gold Project (March 2006) • Appendix A, Permafrost Commitment, p. 93 • NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) • Appendix A, 2006 Permafrost Commitment 1 (p. 43) • 2022 Annual Geotechnical Inspection – Doris Tailings Impoundment Area. Prepared by SRK Consulting. April 2023.
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: In Compliance, Completed.
Summary	KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	The Doris TIA currently includes two dams, the North Dam (a water retaining dam at the north end of the TIA) and the South Dam (a tailings retaining dam at the south end of the TIA). The performance of the North Dam depends on maintaining a frozen foundation and core within the dam. The performance of the South Dam depends on maintaining a frozen dam foundation. Thermistors (or Ground Temperature Cables, GTCs) were installed during the



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	construction of each of these dams (North Dam 2011/2012, South Dam 2018/2019) to monitor thermal performance of each structure. The North Dam includes 11 vertical GTCs and 13 horizontal GTCs. The South Dam includes nine horizontal GTCs, 12 vertical GTCs and one long GTC parallel to the top crest of the foundation key trench. The facility will eventually include a West dam to provide additional tailings retention capabilities when needed later in the life of the facility. The performance of the West Dam will depend on maintaining a frozen dam foundation.
Recommendation/Request	Install GTCs in the West Dam, once constructed, to monitor performance of the dam.
Importance	Low

KIA-Commitment-Permafrost 2

Review Comment Number	Permafrost #2: Reading of these thermistors will be included in routine site monitoring programs to ensure that the condition of the permafrost in close proximity to the key mine activity centres is being monitored to ensure that the permafrost integrity is being maintained through the planned design and mitigation strategies.
References (Report, Section, Page)	<ul style="list-style-type: none"> • NIRB Final Hearing Report for the Doris North Gold Project (March 2006) • Appendix A, Permafrost Commitment, p. 93 • NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) • Appendix A, 2006 Permafrost Commitment 2 (p. 43) • 2022 Annual Geotechnical Inspection – Doris Tailings Impoundment Area. Prepared by SRK Consulting. April 2023.
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: In Compliance, Completed.
Summary	Agree with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Of the 24 GTCs installed during the North Dam construction, 22 are still functional. Of the 27 GTCs installed during the South Dam construction, 20 remain functional. GTC data for the North Dam and South Dam are recorded by dataloggers every six hours. Data is downloaded directly from the data loggers by AEM personnel on a monthly basis. The data are reviewed on a monthly basis by the Engineer of Record and



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	the Design Engineer and compared to the performance criteria for the dam as defined in the dam design.
Recommendation/Request	<ul style="list-style-type: none"> • Continue to maintain and monitor functioning GTCs and review monitoring data as per current practices. • As the West Dam is constructed and additional GTCs are installed to monitor performance, monitor and review data as per current practices at North and South Dams • As GTCs become inactive, consider installation of replacement instruments depending on the observed performance of the dam and the criticalness of the location of the instrument.
Importance	Low

Vegetation Commitments

KIA-Commitment-Vegetation 1

Review Comment Number	Vegetation #1: Avoiding, or reducing, impacts to vegetation units during project planning by re-using previously disturbed areas, where possible
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Vegetation Commitment 1 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Vegetation Commitment 1 (p. 44) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Table 8-2 (p. 8-15) • Appendix D-3, Section 2.1 <p>Hope Bay Mining Ltd. (HBML) Phase 2 Hope Bay Belt Project Proposal (December 2011)</p> <ul style="list-style-type: none"> • Section 5.2.2.1 (p. 266) <p>Miramar Hope Bay Ltd. (MHL) Chapter 4 Project Description (October 2005)</p> <p>Section 4.8.4.4 (p. 4-93)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance



Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>At this point in the Project's timeframe, it is difficult for the reviewer to find documentation supporting this Commitment for the Doris North and Phase 2 components that have been constructed. These 2006 Vegetation Commitments were included in Section 4.8.4.4 of MHL's 2005 Final Project Description for the Doris North Mine. In the 2011 Phase 2 Hope Bay Project Proposal, Section 5.2.2.1, HBML also stated that "<i>Project design is the most effective mitigation strategy for ecosystems and vegetation. The Phase 2 Project will use existing footprint areas from the Doris North Project as much as possible. Access corridors will be synchronized as much as possible.</i>" The 2021 NIRB Annual Report continues to list "minimize footprint of facilities" as a mitigation measure against loss of vegetation and wildlife habitat (Table 8-2).</p> <p>The amount of direct habitat loss due to the development and production phases of the Project has been monitored annually since 2006. However, AEM does not distinguish between loss of undisturbed habitat versus previously disturbed habitat, except as qualitative notes – for example, in Section 2.1.3 of the 2021 WMMP Compliance Report, AEM states that "<i>New construction in 2021 occurred in areas which have already been developed, including small amounts of earthworks around the Madrid North Overburden Pile and Waste Rock Pile continued from previous years (Figure 2.1-2).</i>" As of 2021, the total Project footprint amounts to 3% of the area predicted to be lost in the Madrid-Boston FEIS (129.2 ha of 4,177 ha).</p> <p>The KIA feels that the Proponent(s) has taken reasonable measures to avoid unnecessary habitat disturbance.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • For future annual reporting purposes, AEM should consider measuring or mapping activities on undisturbed vs. previously disturbed land to enable an accurate assessment of this Commitment.
Importance	Low



KIA-Commitment-Vegetation 2

Review Comment Number	Vegetation #2: Avoiding, or reducing, impacts to rare species
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Vegetation Commitment 2 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Vegetation Commitment 2 (p. 44) • Table 3, KIA-NIRB-06 (pp. 11-12) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Table 8-2 (p. 8-15) • Appendix D-3, Section 3.13 <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Section 2.11 (p. 15), Section 3.1.14 (p. 25) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <ul style="list-style-type: none"> • KIA-NIRB-6 (pp. 47-48)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA disagrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>In the 2021 WMMP, Section 2.11 on Vegetation Management states, "<i>Hope Bay has designed the Project to minimize footprints on the land and avoid disturbance of vegetation and rare plants. Identified environmentally sensitive sites and plants were avoided to the extent possible during the design phase of the Project. Habitat loss within the Project footprint will be monitored and compared to impact predictions (Section 3.1.1).</i>"</p> <p>In response to our review comment KIA-NIRB-06 for the 2021 NIRB Annual Report regarding rare plant monitoring and reporting, AEM responded that "<i>Although locations of rare plants species were included as baseline data in the Phase 2 FEIS, rare plant habitat is considered a broader reporting category, given that precise locations recorded for the FEIS in 2010 are neither comprehensive nor up to date. T&C #17 does</i></p>



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	<p><i>not require further surveys for rare plant species. Since the onset of Phase 2 (Certificate No. 009) reporting in 2019, minimal new areas have been cleared, and no rare plant species habitat was lost."</i></p> <p>As noted in the 2021-2022 NIRB Annual Monitoring Report, the NIRB continues to track the status of Project Certificate Terms and Conditions as well as Commitments made by the Proponent from the FEIS (Doris North) and Final Hearing (Phase 2). To comply with this Commitment about avoiding or reducing impacts to rare vegetation species, the KIA recommends that rare plant surveys be completed prior to any new Project clearing activities.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <p>Please conduct rare plant surveys prior to Project clearing activities to ensure compliance with the 2006 Commitments made under Project Certificate No. 003.</p>
Importance	High

KIA-Commitment-Vegetation 3

Review Comment Number	Vegetation #3: Implement dust suppression methods (i.e., spraying with water) on the airstrip and roads during the snow/ice free period
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Vegetation Commitment 3 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Vegetation Commitment 3 (p. 44) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.2, New T&C No. 1 (p. 6-49) • Appendix D-1, Section 3.1 (p. 3-1) <p>TMAC Resources Hope Bay Air Quality Management Plan (April 2019)</p> <p>Section 2.2 (p. 4), Section 5 (p. 14)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance



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Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Implementation of dust suppression measures was included in the Madrid-Boston Project Certificate No. 009, New T&C No. 1. AEM is currently following the Hope Bay Project Air Quality Management Plan (AQMP) developed by TMAC in 2019. Section 2.2 of the AQMP indicates that "<i>Dust suppression is applied to haul roads and the AWR during the snow-free summer months to minimize dust from ore and waste rock haulage, site road traffic and maintenance (grading) when ambient air temperatures permit. The methods used are implemented either in accordance with the Nunavut Environmental Guideline for Dust Suppression (GN 2002) or as otherwise approved with all water usage tracked</i>", followed by additional features/protocols listed for roadway dust suppression.</p> <p>With respect to this Commitment, roads are explicitly mentioned in the AQMP but not the airstrip.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <p>Please clarify if dust suppression methods are used on the Project airstrip.</p>
Importance	Moderate

KIA-Commitment-Vegetation 4

Review Comment Number	Vegetation #4: Apply water to roadways to reduce dust from ore and waste rock haulage and minimizing grading
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Vegetation Commitment 4 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Vegetation Commitment 4 (p. 44) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 1 (p. 6-49) Appendix D-1, Section 3.1 (p. 3-1) <p>TMAC Resources Hope Bay Air Quality Management Plan (April 2019)</p> <p>Section 2.2 (p. 4), Section 5 (p. 14)</p>



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Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Implementation of dust suppression measures was included in the Madrid-Boston Project Certificate No. 009, New T&C No. 1. AEM is currently following the Hope Bay Project Air Quality Management Plan (AQMP) developed by TMAC in 2019. Section 2.2 of the AQMP indicates that " <i>Dust suppression is applied to haul roads and the AWR during the snow-free summer months to minimize dust from ore and waste rock haulage, site road traffic and maintenance (grading) when ambient air temperatures permit. The methods used are implemented either in accordance with the Nunavut Environmental Guideline for Dust Suppression (GN 2002) or as otherwise approved with all water usage tracked</i> ", followed by additional features/protocols listed for roadway dust suppression.
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Vegetation 5

Review Comment Number	Vegetation #5: Install dust covers and sonic sprays to suppress dust generation from equipment in the crushing facility
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Vegetation Commitment 5 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Vegetation Commitment 5 (p. 44) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 1 (p. 6-49) Table 8-1 (p. 8-3) <p>TMAC Resources Hope Bay Air Quality Management Plan (April 2019)</p> <p>Section 2.2 (p. 5), Section 5 (p. 14)</p>



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Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>In Table 8-1 of the 2021 NIRB Annual Report, AEM indicates <i>"Installation of dust covers, sonic sprays, etc. to suppress dust generation from equipment in the crushing facility"</i> as a mitigation measure for air quality. However, there is no mention of dust covers or sonic sprays in the AQMP (TMAC 2019). If these measures were described and implemented during the Project design phase, it is difficult for the reviewer to find the relevant documentation at this point in the Project's timeframe.</p> <p>More recent Project documents appear to demonstrate the Proponent's compliance with the spirit of this Commitment. One mitigation measure in the AQMP is related to crushers: <i>"Discharge heights from the crushers onto conveyors, and conveyors onto stockpiles are minimized. In addition, discharge from crushers onto conveyors or into other equipment is enclosed where practicable."</i> Section 5 (Adaptive Management and Continuous Improvement) also notes that should additional dust mitigation be needed, measures may include covering or enclosure of stockpiles or other dust sources to reduce wind contact. Furthermore, the Q1-Q3 2021 Atmospheric Compliance Monitoring Program Report (March 2022) indicates that Doris Site Dustfall Sampling Station CDF4 is located approximately 200 m away from Quarry 2, where crushing activities occur, to monitor dustfall from crushing activities.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> To ensure compliance with this Commitment, it would be helpful for AEM to supply the NIRB evidence that dust covers, sonic sprays, etc. were installed in the crushing facility.
Importance	Moderate

KIA-Commitment-Vegetation 6

Review Comment Number	Vegetation #6: Install a dust scrubber on the smelting off-gas stream
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References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Vegetation Commitment 6 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Vegetation Commitment 6 (p. 44) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Table 8-1 (p. 8-3) <p>TMAC Resources Hope Bay Air Quality Management Plan (April 2019)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	In Table 8-1 of the 2021 NIRB Annual Report, AEM indicates " <i>Installation of a dust scrubber on the smelting off-gas stream</i> " as a mitigation measure for air quality. However, there is no mention of dust scrubbers in the AQMP. If this measure was described and implemented during the Project design phase, it is difficult for the reviewer to find the relevant documentation at this point in the Project's timeframe.
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <p>It would be helpful for AEM to supply the NIRB with evidence that a dust scrubber was installed on the smelting off-gas stream and details of the specs of that scrubber, as any documentation regarding this commitment is difficult to find.</p>
Importance	Moderate

KIA-Commitment-Vegetation 7

Review Comment Number	Vegetation #7: Re-contouring closure landforms and placing materials to ensure that the final topography and site conditions are similar to other vegetation units of the same type in the region
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Vegetation Commitment 7 (p. 93)



	<p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Vegetation Commitment 7 (p. 44) Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022) Section 6.2, New T&C No. 8 (p. 6-56) Sections 11.1 and 11.2 (pp. 11-1 to 11-2) <p>TMAC Resources Hope Bay Project Doris-Madrid Interim Closure and Reclamation Plan (November 2017)</p> <ul style="list-style-type: none"> Section 1.6 (p. 8) Table 2, Part L. 19 (p. 6) <p>TMAC Resources Hope Bay Project Boston Conceptual Closure and Reclamation Plan</p> <p>Section 1.6 (p. 5)</p>
<p>Proponent's Compliance Status</p> <p>(From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA agrees with AEM's Active, In Compliance status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>Requirement of a plan to re-contour and restore the natural aesthetics of the area to the extent practicable was included in the Madrid-Boston Project Certificate No. 009, New T&C No. 8.</p> <p>Section 1.6 in both the Doris-Madrid Interim Closure and Reclamation Plan (CRP) and the Boston Conceptual CRP outline the closure objectives and criteria, including to "<i>Ensure the future use and aesthetics of the project site following reclamation activities meets the requirements of Aboriginal, Federal and Territorial governments, landowners, local communities and regulatory authorities.</i>" The Doris-Madrid Interim CRP also includes a requirement as part of the Type A Water License, that "<i>The Licensee shall contour and stabilize all disturbed areas to a pre-disturbed state upon completion of work</i>" (Part L. 19).</p> <p>Section 11 of the 2021 NIRB Annual Report describes Closure and Reclamation activities for the Hope Bay Project in 2021. Efforts to meet this Commitment include removing the eastern portion of the Madrid North Portal Pad and Madrid North Portal Laydown down to the pre-existing natural grade.</p>
<p>Recommendation/Request</p>	<p>The KIA requests/recommends the following:</p>



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	<ul style="list-style-type: none"> • Please continue to report on reclamation activities that aim to meet this Commitment and CRP closure objective and criterion. • As per New T&C No. 8, the KIA expects to have continued site visit opportunities to determine if AEM's progressive reclamation efforts to meet this Commitment are satisfactory.
Importance	Moderate

KIA-Commitment-Vegetation 8

Review Comment Number	Vegetation #8: Allow areas to revegetate during operations (e.g., progressive) and promoting natural vegetation regeneration throughout the mine life
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Vegetation Commitment 8 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Vegetation Commitment 8 (p. 45) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.2, New T&C No. 8 (p. 6-56), No. 18 (p. 6-66) • Sections 11.1 and 11.2 (pp. 11-1 to 11-2) <p>TMAC Resources Hope Bay Project Doris-Madrid Interim Closure and Reclamation Plan (November 2017)</p> <ul style="list-style-type: none"> • Section 4.5.2 (p. 22), Section 4.5.5 (p. 26), Section 5 (pp. 31-32) • Table 2, Parts L. 14 and L. 17 (p. 6) <p>TMAC Resources Hope Bay Project Boston Conceptual Closure and Reclamation Plan</p> <p>Section 4.4.2 (p. 15), Section 5 (p. 23)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Requirements to develop and implement a program to progressively reclaim disturbed areas, including



	<p>consideration for the feasibility of topsoil/organic matter salvage to promote revegetation, were included in the Madrid-Boston Project Certificate No. 009, New T&C No. 8. In addition, New T&C No. 18 states that progressive reclamation efforts should <i>“encourage recolonization by native plant species. These efforts are expected to be informed by revegetation trials in the Project area and must include monitoring protocols over sufficient timeframes to measure success and ensure invasive plant species have not established.”</i></p> <p>The Doris-Madrid Interim CRP also includes two relevant requirements as part of the Type A Water License: <i>“The Licensee shall carry out progressive reclamation of any components of the project no longer required for the Licensee’s operations”</i> (Part L. 14); and <i>“In order to promote growth of vegetation and the needed microclimate for seed deposition, all disturbed surfaces shall be prepared by ripping, grading, or scarifying the surface to conform to the natural topography”</i> (Part L. 17).</p> <p>Progressive Reclamation is described in Section 5 of both CRPs; however, revegetation is not mentioned in these sections and AEM does not have a specific progressive revegetation program. Revegetation is mentioned in Section 4.5.5 of the Doris-Madrid Interim CRP and Section 4.4.2 of the Boston Conceptual CRP: <i>“In areas backfilled with suitable overburden soils, revegetation works may consist of application of seeds collected from the surrounding vegetation. Active revegetation of barren rock fill pads is not practical because the rock fill cannot support vegetation; however, it is expected that lichens will colonise the rock surface in time, likely decades.”</i> Aside from these statements, revegetation is also noted in Section 4.5.2 of the Doris-Madrid Interim CRP, where <i>“the overburden stockpiles will be regraded to a stable landform as required and revegetated where possible.”</i></p> <p>To address New T&C No. 18, which aims to encourage re-establishment of native plant species in disturbed areas, AEM referred to the CRPs and Section 13.1 of their 2021 Annual Report submitted to the Nunavut Water Board (which appears to be equivalent to Section 11 of the 2021 NIRB Annual Report). Although there is a brief description of progressive reclamation efforts in 2021 in Section 11.1, there is no discussion of revegetation. Overall, the KIA feels that AEM is only partially compliant with this Commitment</p>
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	because progressive revegetation efforts do not appear to have been planned or reported on in a meaningful way.
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please include planned revegetation activities in Section 5 (Progressive Reclamation) of both Doris-Madrid and Boston CRPs. • Please report on the extent of progressive reclamation activities (including revegetation success) in the NIRB annual report, as required under the Project Certificate No. 009, New T&C No. 18.
Importance	Moderate

KIA-Commitment-Vegetation 9

Review Comment Number	Vegetation #9: Using adaptive management approaches to ensure that advances in revegetation research are included in final closure planning efforts
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Vegetation Commitment 9 (p. 93) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Vegetation Commitment 9 (p. 45) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.2, New T&C No. 18 (p. 6-66) <p>TMAC Resources Hope Bay Project Doris-Madrid Interim Closure and Reclamation Plan (November 2017)</p> <ul style="list-style-type: none"> • Section 5.3 (p. 32) <p>TMAC Resources Hope Bay Project Boston Conceptual Closure and Reclamation Plan</p> <ul style="list-style-type: none"> • Section 7 (p. 27) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 3.1.14 (p. 25)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance



Summary	The KIA <i>disagrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Under Project Certificate No. 009, New T&C No. 18 states that progressive reclamation efforts should <i>"encourage recolonization by native plant species. These efforts are expected to be informed by revegetation trials in the Project area and must include monitoring protocols over sufficient timeframes to measure success and ensure invasive plant species have not established."</i></p> <p>Section 5.3 of the Doris-Madrid Interim CRP and Section 7 of the Boston Conceptual CRP describes Reclamation Studies/Research to Support Reclamation. The Proponent states that there are no direct research projects currently undertaken at Hope Bay. However, data from vegetation studies (among others) <i>"gathered as part of the compliance monitoring program are being continuously collected and periodically reviewed by qualified specialist consultants. ... Where appropriate, dedicated research programs will be undertaken to reduce uncertainty and evaluate the performance of specific closure methods."</i></p> <p>It is unclear what the listed vegetation studies involve, as there is no further information in the CRPs nor in the 2021 WMMP, Section 3.1.14 on Monitoring of Plants, which simply states that <i>"Loss of habitat within Project footprints resulting from construction activities will be tracked and summarized in comparison to impacts predictions."</i> To comply with New T&C No. 18, revegetation trials in the Project area need to be undertaken. Furthermore, to comply with this Commitment, AEM should stay abreast of other revegetation research in Arctic environments and demonstrate how the results were incorporated into revegetation planning.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please clarify whether the vegetation studies listed in the Doris-Madrid and Boston CRPs include revegetation trials as noted in the Project Certificate No. 009, New T&C No. 18. <p>Please include a summary of revegetation research in the Arctic and how these research results were/will be used in revegetation planning for the Hope Bay Project. These details should be included in the CRPs or as supporting documents.</p>
Importance	Moderate



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Caribou Commitments

KIA-Commitment-Caribou 1

Review Comment Number	Caribou #1: Integration of <i>Inuit Qaujimajatuqangit</i> into monitoring programs
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 1 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 1 (p. 46) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.2, New T&C No. 19 (p. 6-67) and No. 43 (p. 6-91) • Appendix D-3, Section 1.1.2 (pp. 1-2 to 1-3) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 1.4 (p. 3), Section 3.1 (various)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: In Compliance, Completed.
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>The requirement to incorporate Inuit Qaujimajatuqangit (IQ) while developing monitoring plans for the Project was included in Project Certificate No. 009, New T&Cs No. 43 (general) and No. 19 (WMMP).</p> <p>Section 1.4 (Plan Management and Implementation) of the 2021 WMMP indicates that the WMMP is a living document and enhancements can be made as a result of Traditional Knowledge (TK), ecological knowledge learned from elders or land users while working in the field, or feedback from IEAC workshops. IQ or Inuit TK is referenced throughout the WMMP, including the Monitoring sections for caribou, grizzly bear, muskox, wolverine, upland birds, and waterbirds.</p> <p>In Section 1.1.2 of the 2021 WMMP Compliance Report, AEM states that they are committed to considering and incorporating TK into all stages of the WMMP, including</p>



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	identification of mitigation measures, monitoring study design, data collection, and follow-up programs to obtain feedback. AEM describes how IQ was previously included from the Inuit TK report for Hope Bay (Banci and Spicker 2016) and from caribou workshops with Elders and harvesters prior to the Madrid-Boston FEIS application; and how IQ continues to be included through ongoing input from the IEAC and the KIA.
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Caribou 2

Review Comment Number	Caribou #2: Restricting the mine surface footprint to a small and confined area of 53 ha
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 2 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 2 (p. 46) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Table 8-2 (p. 8-15) <p>Appendix D-3, Section 2.1</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Status from 2021-2022 NIRB Monitoring Report: Active, In Compliance
Summary	The KIA is unable to comment on AEM's "Active, In Compliance" status for this Commitment.
Detailed Review Comment	<p>At this point in the Project's timeframe, after several project design changes since the original Doris North FEIS, it is difficult for the reviewer to find documentation providing context for or supporting this Commitment.</p> <p>As summarized in Table 8-2 of the 2021 NIRB Annual Report, one measure taken by AEM to mitigate against habitat loss is to minimize the footprint of facilities. The 2021 WMMP Compliance Report shows that the overall Hope Bay Project (including Phase 2) footprint covers 129.2 ha, which is 3% of</p>



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	<p>the area predicted to be lost in the Madrid-Boston FEIS (4,177 ha).</p> <p>As noted in review comment Error! Reference source not found., the KIA feels that the Proponent(s) has taken reasonable measures to avoid unnecessary habitat disturbance, even if the Project footprint is now greater than 53 ha.</p>
Recommendation/Request	<p>The relevance of this past reference to the Doris North Project may have lost contextual meaning, as reporting now includes a since-expanded mine footprint area and project in general. Consider updating this commitment to include reference to the latest approved disturbance value.</p>
Importance	Low

KIA-Commitment-Caribou 3

Review Comment Number	Caribou #3: Minimizing the amount of clearing
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 3 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 3 (p. 46) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Table 8-2 (p. 8-15) Appendix D-3, Section 2.1
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Please see detailed review comments for Error! Reference source not found. and Error! Reference source not found..</p> <p>As summarized in Table 8-2 of the 2021 NIRB Annual Report, two measures taken by AEM to mitigate against habitat loss are to minimize the footprint of facilities and to minimize disturbance of vegetation, permafrost and soils outside of Project footprints.</p>



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	The KIA feels that the Proponent(s) has taken reasonable measures to avoid unnecessary habitat disturbance.
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Caribou 4

Review Comment Number	Caribou #4: Reduce noise by use of muffled exhaust systems
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 4 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 4 (p. 46) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.1, Revised T&C No. 29 (p. 6-27) Section 6.2, New T&C No. 4 (p.6-52) Appendix D-3, Section 1.1.2 (pp. 1-2 to 1-3) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.2.2 (p. 5), Section 2.6 (p. 13) <p>TMAC Resources Hope Bay Project Noise Abatement and Monitoring Plan (December 2017)</p> <p>Sections 3.2 and 4 (pp. 7-9)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	The requirement to develop and implement a noise abatement plan is included in Project Certificate No. 003, Revised T&C No. 29, and Project Certificate No. 009, New T&C No. 4. In the 2021 NIRB Annual Report, AEM stated that they do not maintain a standalone Noise Abatement Plan; rather, for the protection of wildlife, AEM implements noise management under the WMMP. It is unclear why AEM did not adopt TMAC's 2017 Noise Abatement and Monitoring Plan, as this plan is much more detailed than AEM's plan. For example, the 2021 WMMP



	<p>only mentions noise monitoring for caribou and muskox, and for road and traffic management, with generic statements such as “<i>Construct and maintain equipment to minimize the generation of noise</i>” and “<i>All equipment will be properly maintained to manage noise levels.</i>”</p> <p>Of relevance to this Commitment, TMAC’s Noise Abatement Plan indicates that operational controls that can be implemented during construction, operation, care and maintenance, and closure include ensuring equipment (e.g., mobile and motorized equipment) is fitted with appropriate mufflers and silencers. However, the wording is ambiguously written as “have been considered”, “will be considered”, “will continue to be implemented”, “where possible”, and “where required”. Thus, it is unclear whether mufflers and silencers have been installed on all applicable equipment.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please clarify whether mufflers and silencers are being used and maintained on mobile and motorized equipment. • Please explain why TMAC’s 2017 Noise Abatement Plan was not adopted, as this plan is intended to comply with Project Terms and Conditions. Even if AEM does not wish to maintain a standalone document, the management and monitoring procedures described in this plan should be incorporated into the WMMP, where appropriate.
Importance	Moderate

KIA-Commitment-Caribou 5

Review Comment Number	Caribou #5: All diesel-powered equipment will meet emission guidelines
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 5 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 5 (p. 46) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.2, New T&C No. 1 (p. 6-49)



	<ul style="list-style-type: none"> Table 8-2 (p. 8-14) Appendix D-1, Section 3.2 (pp. 3-10 to 3-12); Section 4.3 (pp. 4-7 to 4-15) <p>TMAC Resources Hope Bay Air Quality Management Plan (April 2019)</p> <p>Section 3.2 (pp. 8-9)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	<p>The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.</p>
Detailed Review Comment	<p>The reviewer could not find direct documentation supporting this Commitment. However, mitigation measures for air quality, as summarized in Table 8-2 of the 2021 NIRB Annual Report, include:</p> <ul style="list-style-type: none"> Emission control systems used on equipment, where applicable Fuel efficient and low emission equipment use, where applicable Regular equipment servicing and preventative maintenance. Ongoing dust deposition and airborne particulate monitoring and reporting <p>The Hope Bay AQMP includes suspended particulate monitoring for particles with a diameter less than 2.5 µm (PM_{2.5}). The majority of particulate matter emitted in diesel engine exhaust is PM_{2.5}. Thus, although diesel-powered equipment may not be individually verified to meet emission guidelines (though this is for AEM to confirm), there is a monitoring program in place to determine if overall emissions from the Project exceed the GN's 2011 <i>Environmental Guideline for Ambient Air Quality</i> and Canadian Ambient Air Quality Standards (CAAQS).</p> <p>The Q1-Q3 2021 Atmospheric Compliance Monitoring Program Report (March 2022) indicates that all PM_{2.5} measurements were below air quality objectives and also below the maximum 2017 FEIS predictions.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please clarify whether diesel-powered equipment is verified to meet emission guidelines (e.g., data from the manufacturer, or measured as part of maintenance



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	procedures). If these data are available, please include in future annual reporting to enable an accurate assessment of this Commitment.
Importance	Moderate

KIA-Commitment-Caribou 6

Review Comment Number	Caribou #6: Minimum flying altitude of 300 m above ground level for cargo and passenger aircraft outside of the Project area
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 6 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 6 (p. 46) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Table 8-2 (p. 8-16 to 8-19) Appendix D-3, Section 2.3.4 (p. 2-10) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 2.7 (p. 14), Table 2.2-1 (p. 6)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Section 2.7 of the 2021 WMMP outlines aircraft management to minimize potential disturbance and mortality effects to wildlife. These measures include:</p> <ul style="list-style-type: none"> Fixed-wing aircraft will maintain at least 610 m elevation except for take-offs and landing and at the discretion of the pilot for safety concerns. Helicopters will maintain 300 m vertical and 600 m horizontal separation (including starts and takeoffs) from caribou and muskox, where safe to do so. <p>Additional caribou-specific protection measures during the calving period (June 5 to June 20) are outlined in Table 2.2-2:</p>



	<p>when 1+ animals are observed in the calving range, or 1+ females with calves are observed 15 km from site, helicopter flights will avoid animals by as large a margin as possible, with a minimum of 610 m vertically and 600 m horizontally when safe to do so.</p> <p>The 2021 WMMP Compliance Report did not examine average or daily flight elevations above ground (Section 2.3.4). As such, the reviewer cannot determine if the WMMP aircraft management measures for flight elevation were followed by Project staff.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please confirm whether helicopter and fixed-wing flights adhered to the minimum elevation guidelines specified in the 2021 WMMP. • Please consider including a summary log of flight altitudes and mitigation measures/management actions taken by pilots when caribou are observed (e.g., increasing flight elevation) in future annual reports.
Importance	High

KIA-Commitment-Caribou 7

Review Comment Number	Caribou #7: Vehicles restricted to designated roads and prepared work areas (i.e., recreational use of off-road vehicles is prohibited)
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 7 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 7 (p. 47) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Table 8-2 (p. 8-15) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Section 2.6 (p. 13)



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Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: In Compliance, Completed.
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Section 2.6 of the 2021 WMMP outlines road and traffic management to minimize potential disturbance and mortality effects to wildlife, vegetation, and special landscape features. These measures include: <i>"Vehicles will be restricted to the Project footprint, site roads, and quarries, except where required for environmental monitoring and exploration activities."</i></p> <p>As far as the reviewer is aware, there have been no issues of non-compliance for this mitigation measure. It is assumed that any off-road incidents would be included in the annual WMMP Compliance Report (there was no mention in the 2021 report).</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please commit to reporting on compliance or non-compliance issues with regards to this commitment.
Importance	Moderate

KIA-Commitment-Caribou 8

Review Comment Number	Caribou #8: Implement dust suppression methods (i.e., spraying with water) on the airstrip and roads during the snow/ice free period (chemical dust suppressants will not be used)
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 8 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 8 (p. 47) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 1 (p. 6-49) Appendix D-1, Section 3.1 (p. 3-1) <p>TMAC Resources Hope Bay Air Quality Management Plan (April 2019)</p>



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	<ul style="list-style-type: none"> Section 2.2 (p. 4), Section 5 (p. 14)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: In Compliance, Completed.
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Please see detailed review comment for Error! Reference source not found..</p> <p>An additional consideration of this Commitment (for caribou) is about not using chemical dust suppressants. The AQMP states that "<i>Watering may be supplemented with the use of GN approved chemical dust suppressants as required.</i>" AEM does not specify which chemical dust suppressant is preferred or used, if needed. From the list of approved dust suppressants in the GN's 2002 (revised in 2014) <i>Environmental Guideline for Dust Suppression on Unpaved Roads</i>, the KIA requests that DUST-STOP (now called DUST/BLOKR on the Cypher Environmental website) be the preferred alternative to water application. DUST-STOP is the most environmentally and wildlife-friendly option as it is made of sugar, starch, and minerals and is non-toxic.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please clarify which GN-approved chemical dust suppressants have been/are used for the Hope Bay project. Please use DUST-STOP if a water alternative is needed and include these details in the AQMP.
Importance	Moderate

KIA-Commitment-Caribou 9

Review Comment Number	Caribou #9: Install dust covers and sonic sprays to suppress dust generation from equipment in the crushing facility
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 9 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 9 (p. 47)



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	<p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 1 (p. 6-49) Table 8-1 (p. 8-3) <p>TMAC Resources Hope Bay Air Quality Management Plan (April 2019)</p> <p>Section 2.2 (p. 5). Section 5 (p. 14)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Please see detailed review comment for Error! Reference source not found..
Recommendation/Request	Please see recommendation/request for Error! Reference source not found..
Importance	Moderate

KIA-Commitment-Caribou 10

Review Comment Number	Caribou #10: Install a dust scrubber on the smelting off-gas stream
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 10 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 10 (p. 47) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <p>Table 8-1 (p. 8-3)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Please see detailed review comment for Error! Reference source not found..



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Recommendation/Request	Please see recommendation/request for Error! Reference source not found..
Importance	Moderate

KIA-Commitment-Caribou 11

Review Comment Number	Caribou #11: Conducting pre-project surveys to identify wildlife sensitive locations and protected areas for avoidance
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 6 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 6 (p. 47) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Table 8-2 (p. 8-16 to 8-19) Appendix D-3, Section 2.3.4 (p. 2-10) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 2.7 (p. 14), Table 2.2-1 (p. 6)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: In Compliance, Completed.
Summary	The KIA <i>disagrees</i> with AEM's "No Longer Active, Completed" status for work completed to date.
Detailed Review Comment	Although wildlife sensitive locations were primarily identified for the Doris and Madrid-Boston FEIS applications, there are still future Project components that require additional baseline surveys, such as for wind turbines (see review comment Error! Reference source not found.).
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please revise the 2021 and 2022 Status of this Commitment to "Active, In Compliance" in the NIRB Annual Monitoring Report.
Importance	High



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KIA-Commitment-Caribou 12

Review Comment Number	Caribou #12: Reclaiming areas during operations (e.g., progressive) and promoting natural vegetation regeneration throughout the mine life
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 12 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 12 (p. 47) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.2, New T&C No. 8 (p. 6-56), No. 18 (p. 6-66) • Sections 11.1 and 11.2 (pp. 11-1 to 11-2) <p>TMAC Resources Hope Bay Project Doris-Madrid Interim Closure and Reclamation Plan (November 2017)</p> <ul style="list-style-type: none"> • Section 4.5.2 (p. 22), Section 4.5.5 (p. 26), Section 5 (pp. 31-32) • Table 2, Parts L. 14 and L. 17 (p. 6) <p>TMAC Resources Hope Bay Project Boston Conceptual Closure and Reclamation Plan</p> <ul style="list-style-type: none"> • Section 14.4.2 (p. 15), Section 5 (p. 23)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Please see detailed review comment for Error! Reference source not found..
Recommendation/Request	Please see recommendation/request for Error! Reference source not found..
Importance	Moderate

KIA-Commitment-Caribou 13

Review Comment Number	Caribou #13: Wildlife awareness and sensitivity training for on-site personnel
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<p>References (Report, Section, Page)</p>	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 13 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 13 (p. 47) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.1, Revised T&C No. 24 (p. 6-22) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Section 2.1 (p. 4)
<p>Proponent's Compliance Status (From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>The requirement for wildlife awareness and sensitivity training is included in Project Certificate No. 003, Revised T&C No. 24. Section 2.1 of the 2021 WMMP outlines on-site personnel training and awareness policies and management actions to protect wildlife, including:</p> <ol style="list-style-type: none"> 1. Training for all personnel in their responsibilities to protect wildlife and wildlife habitat (SOP Wildlife Awareness); 2. Guidance to staff on how to avoid staff/wildlife interactions; 3. Ongoing education related to the dangers of improper food waste disposal and feeding wildlife (SOPs General Site Rules and Wildlife Awareness); 4. Bear awareness training and implementation of Bear Notification and Response Procedures (SOP Bear Notification and Responses); 5. A Wildlife Response Team (WRT) trained in bear and predatory wildlife response to minimize the risk to both personnel and wildlife; 6. A no feeding of wildlife policy; 7. A no littering policy; 8. A no hunting policy; 9. All wildlife has the right-of-way on roads and personnel must remain within their vehicle while waiting for animals to pass; and



	<p>10. Establishment and enforcement of speed limits on roads.</p> <p>There is no further information in the 2021 WMMP regarding frequency of training/re-training (e.g., annually or as corrective action after a wildlife encounter or incident). However, these details may exist in the referenced SOPs, which the KIA would be interested in reviewing.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please clarify how often Project staff are trained/re-trained on wildlife awareness and sensitivity issues. • Please consider submitting the wildlife training SOPs to the KIA and other interested parties for review.
Importance	Moderate

KIA-Commitment-Caribou 14

Review Comment Number	Caribou #14: Participation in the Bathurst Caribou Management Committee
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 14 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 14 (p. 47)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Status from 2021-2022 NIRB Monitoring Report: Active, In Compliance
Summary	The KIA is unable to comment on with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	The KIA cannot find any record of participation of the proponent on this committee. If the proponent was involved in this committee, they would need to supply this information, as this could not be found on the public record.
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Information on whether the proponent ended up participating in the Bathurst Caribou Management Committee, and how this was undertaken.
Importance	Moderate



KIA-Commitment-Caribou 15

Review Comment Number	Caribou #15: Implement caribou crossing locations along the road based on local information from the Hunters and Trappers Associations and KIA, among others
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 15 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 15 (p. 48) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Appendix D-3, Section 1.1.2 (pp. 1-2 to 1-3), Section 3.4.3.5 (pp. 3-21 to 3-25), Section 3.4.4.4 (p. 3-27) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 2.2.3 (p. 9), Section 2.6 (p. 13), Section 3.1.2.1 (pp. 17-18), Section 3.1.6.2 (p. 20-21)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: In Compliance, Completed.
Summary	The KIA <i>partially agrees</i> with AEM's "No Longer Active, Completed" status for work completed to date.
Detailed Review Comment	<p>Sections 2.2.3 (Mitigation for Potential Disruption to Movement) and 2.6 (Road and Traffic Management) of the 2021 WMMP describe the incorporation of local information for designing caribou road crossing structures:</p> <p><i>"As suggested by caribou workshop participants during the second caribou workshop, Elders and land users will advise on the locations where caribou crossing structures will be on installed on roads" and "Roads will be constructed with caribou crossing structures where roads cross identified caribou trails."</i></p> <p>Section 1.1.2 of the 2021 WMMP Compliance Report summarizes how IQ has been considered and incorporated into the WMMP. AEM discusses the results of the caribou workshops held with Elders and harvesters in 2016-2017 (<i>"The group reached consensus on the workshop conclusions, with participants agreeing that caribou protection measures would keep caribou safe."</i>) and also notes that the KIA has</p>



	<p>provided feedback on the construction and monitoring of road crossings (e.g., facilities/wildlife interaction camera monitoring) on the Doris-Windy All-Weather-Road (AWR).</p> <p>Furthermore, Height of Land (HOL) surveys are planned to be conducted at a set of monitoring locations to monitor for caribou near the road, and the results will be used to evaluate caribou behaviour in relation to roads and wildlife crossing structures (Section 3.1.6.2 of the WMMP). As of 2022 annual reporting, AEM explained that HOL surveys have not yet been implemented, but potential survey locations were identified during reconnaissance surveys in 2021, and an in-person site visit with the IEAC was planned for 2022.</p> <p>The KIA agrees that this Commitment has been met with respect to the original construction of the existing Project roads. However, it is important to bear in mind that caribou are mobile and movement patterns may shift in the future. As such, local information from land users, the IEAC, and the KIA may need to be updated to enable adaptive management concepts within the WMMP to be realized (e.g., construction of new road crossings, where needed).</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please continue to consider and incorporate local knowledge from Inuit land users to enable adaptive management of caribou protection measures, including potential new road crossings, where needed and where large-scale changes in movement patterns and distribution begin to occur.
Importance	High

KIA-Commitment-Caribou 16

Review Comment Number	Caribou #16: Give caribou the right-of-way (i.e., all vehicles must stop when wildlife are on the road or approaching)
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 16 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 16 (p. 48) Table 3, KIA-NIRB-15 (p. 13)



	<p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.1, Revised T&C No. 24 (p. 6-22) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.1 (p. 4) Sections 2.2.1 to 2.2.5 (pp. 4-10) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <p>KIA-NIRB-15 (pp. 67-68)</p>
<p>Proponent's Compliance Status</p> <p>(From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>In addition to training on-site personnel that all wildlife has the right-of-way on roads (see review comment Error! Reference source not found.), the 2021 WMMP includes detailed mitigation measures for caribou and muskox protection on or near roads. Table 2.2-1 presents the mitigation when 1+ animals are observed on or within 500 m of the road:</p> <ol style="list-style-type: none"> Ongoing Mitigation: <ol style="list-style-type: none"> Speed limits of 50 km/hr. or less Wildlife is given the right of way and drivers stay in vehicles if stopped. Signs posted indicating wildlife has right of way. Environment Department notified. Environment Manager informs personnel who need to be aware of caribou and muskox – drivers. Drivers evaluate distance from the road and caribou or muskox behaviour and react following the Driver Flow Chart (Figure 2.2-1) <p>Furthermore, in response to review comment KIA-NIRB-15 on the 2021 Annual Report regarding potentially disturbed caribou, AEM stated that they "<i>maintain strict mitigation measures, including enforcing speed limits and animal right-of-way rules (stop, turn off vehicle and lights until caribou has left the road. Any reports of disregarding these rules are addressed with camp-wide reminders and/or personal corrective action.</i>"</p>



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	The KIA appreciates that caribou right-of-way guidelines are strictly enforced by AEM.
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Caribou 17

Review Comment Number	Caribou #17: Allowing natural encroachment of vegetation on or near roads, airstrip and the active mine site
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 17 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 17 (p. 48) <p>TMAC Resources Hope Bay Project Doris-Madrid Interim Closure and Reclamation Plan (November 2017)</p> <ul style="list-style-type: none"> Section 4.5.5 (p. 26)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>At this point in the Project's timeframe, it is difficult for the reviewer to find documentation providing context for or supporting this Commitment. It is unclear which phase(s) of the Project this Commitment is referring to – during Operations or Closure and Reclamation? If the intent of this Commitment is regarding reclamation, please see Error! Reference source not found. for the KIA's comments on AEM's progressive reclamation plan.</p> <p>However, if this Commitment is referring to ongoing site maintenance protocols during Operations (e.g., clearing a smaller ROW next to roads and the airstrip), the KIA was unable to find documentation on this topic.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please see recommendation/request for Error! Reference source not found..



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	<ul style="list-style-type: none"> For future annual reporting, the NIRB should consider clarifying if this 2006 Caribou Commitment 17 essentially corresponds to 2006 Vegetation Commitment 8, or if additional commitments were requested of the Proponent.
Importance	Low

KIA-Commitment-Caribou 18

Review Comment Number	Caribou #18: Use of Inukshuks or other initiatives determined through consultation with Elders to deter Caribou from site
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 18 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 18 (p. 48) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.1, Revised T&C No. 26 (p. 6-24) Appendix D-3, Section 3.4.3.2 (p. 3-16), Section 3.4.4.2 (p. 3-26), Section 3.4.3.4 (p. 3-21), Section 3.4.4.3 (p. 3-27), Section 3.10 (p. 3-63) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 2.2.6 (p. 10), Section 3.1.6.2 (p. 21)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>The requirement to consult with local Elders and other parties to develop mitigation measures to discourage wildlife and birds from coming into contact with the Tailings Impoundment Area (TIA) and contaminated areas of the mill site was included in Project Certificate No. 003, Revised T&C No. 26.</p> <p>In Section 2.2.6 (Mitigation for Attraction) and Section 3.1.6.2 (Caribou Monitoring in Proximity to Tailings) of the 2021</p>



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	<p>WMMP, AEM states that <i>"If caribou are found to be interacting with the TIA, and the water quality in the TIA poses a risk to caribou health, then Hope Bay will engage with the IEAC to inform the placement of Inuksuit in the field to direct caribou away from the TIA."</i></p> <p>To date, water quality measurements and wildlife observations at the TIA have not indicated the need to install inukshuks. In Section 3.10 of the 2021 WMMP Compliance Report. AEM states that water quality at the TIA did not exceed guidelines for wildlife in 2021; thus, no risk assessment was warranted. In the Facilities Camera Monitoring sections, AEM stated that <i>"the majority of camera events and incidental sightings were not at the TIA, suggesting that caribou were not attracted to the TIA or more likely to interact with the TIA than other infrastructure."</i> AEM further explains that <i>"Caribou seen near the TIA were monitored for behavior until they left the area; the TIA was also examined after the caribou left to determine the solidity of the TIA substrate, which was found to have a solid base and did not pose a risk for sinking or trapping wildlife."</i></p>
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Caribou 19

Review Comment Number	Caribou #19: Establishing and enforcing speed limits
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 19 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 19 (p. 48) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.1 (p. 4), Sections 2.2.3 to 2.2.4 (p. 9), Section 2.6 (p. 13) Table 2.2-1 (p. 6), Table 2.2-2 (p. 7)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance



Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>The 2021 WMMP includes a speed limit of 50 km/hr. on all Project roads to reduce the potential for wildlife-vehicle collisions. This speed limit is reiterated as a protection measure for when caribou or muskox are on or within 500 m of the road (Table 2.2-1), to mitigate against potential disruption to movement (Section 2.2.3) and direct mortality and injury (Section 2.2.4). In addition, when 3-50 females with calves are visible from Project footprint areas, traffic is to proceed slowly (<20 km/hr.). Reduced speed is also advised when conditions, such as blowing snow, reduce visibility such that wildlife on or near the road might be obscured.</p> <p>Section 2.1 (On-Site Personnel Training and Awareness) of the WMMP notes the "establishment and enforcement of speed limits on roads" as a policy and management action. However, it is unclear how speed limits are enforced and whether Project staff have been compliant (e.g., there is no mention of speed compliance reporting in the 2021 WMMP Report).</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please explain how the 50 km/hr speed limit is enforced on Project roads (e.g., method, location, frequency of enforcement).
Importance	Moderate

KIA-Commitment-Caribou 20

Review Comment Number	Caribou #20: Implementing procedures for the safe removal of caribou from hazardous areas (e.g., roads and airstrip)
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Caribou Commitment 20 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Caribou Commitment 20 (p. 48) Table 3, KIA-NIRB-15 (p. 13) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 21 (p. 6-69)



	<p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Table 2.2-1 (p. 6) • Section 2.2.6 (p. 10), Section 2.2.7 (p. 11) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <ul style="list-style-type: none"> • KIA-NIRB-15 (pp. 67-68)
<p>Proponent's Compliance Status</p> <p>(From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>The 2021 WMMP includes a few measures related to wildlife (including caribou) deterrence from hazardous areas:</p> <ul style="list-style-type: none"> • Table 2.2-1 (Caribou and Muskox Protection Measures during All Seasons) – <i>"In the case of caribou or muskox near the airstrip(s), observations are performed. If the risk of interaction with a plane exists, then flights will be held. If caribou or muskox remain in the area, then procedures for moving them off the runway are followed."</i> • Section 2.2.6 (Mitigation for Attraction) – <i>"Consider the use of Inuksuit to deter caribou from the TIA in consultation with the IEAC if caribou are observed drinking the water and the water does not meet applicable wildlife safety guidelines."</i> • Section 2.2.7 (Mitigation for Altered Environmental Media Quality) – <i>"Appropriate measures taken to exclude or deter wildlife from areas where water or waste could pose a risk to wildlife."</i> <p>However, there are no further details in the WMMP regarding what these procedures and "appropriate measures" involve. The KIA brought up this issue in our annual report review comment KIA-NIRB-15, as Project staff noted in the 2021 Wildlife Sightings Log (part of the 2021 WMMP Compliance Report) that a caribou was escorted off site to avoid haul trucks. In response, AEM explained that <i>"Caribou are occasionally escorted away from dangerous site areas, such as off the runway prior to plane landings. This is only conducted when the location is considered hazardous to the animal, as was the case for the animal near the mill area; it was in a difficult to</i></p>



	<p><i>see corner and there was concern that haul trucks or other large vehicles would not be able to see the animal when turning through the area. Escorts consist of a pickup truck slowly guiding the animal away from the dangerous location, maintaining as much distance as possible from the animal. These mitigation measures will be reported in future annual WMMP Reports for improved transparency.”</i></p> <p>The KIA appreciates that AEM will report on caribou deterrence measures needed/implemented for annual reporting purposes in the future. However, it would also be beneficial to include details about escorting caribou from hazardous areas (as noted by AEM) into the next revision of the WMMP (or associated SOP). The procedures should be documented prior to implementation to ensure that Project staff understands what should (and should not) be done to avoid undue disturbance to caribou.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please include further details about caribou deterrence from hazardous areas in the WMMP.
Importance	High

KIA-Commitment-Caribou 21

Review Comment Number	Caribou #21: Warning drivers when caribou are moving through the area
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Caribou Commitment 21 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Caribou Commitment 21 (p. 48) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Table 2.2-1 (p. 6), Table 2.2-2 (p. 7), Figure 2.2-1 (p. 8)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.



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Detailed Review Comment	Tables 2.2-1 and 2.2-2 in the 2021 WMMP outline protection measures for caribou and/or muskox when they are observed at the Project site, on site roads, and also for regional monitoring. When an animal(s) is observed, the Environment Department is notified, then the Environment Manager informs personnel (i.e., drivers) who need to be aware of caribou and muskox. Drivers then undertake mitigation when caribou and muskox are observed on or up to 500 m from the road, as shown on Figure 2.2-1.
Recommendation/Request	N/A
Importance	N/A

Grizzly Bear Commitments

KIA-Commitment-Grizzly Bear 1

Review Comment Number	Grizzly Bear #1: Integration of <i>Inuit Qaujimajatuqangit</i> into education, monitoring and response programs
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Grizzly Bear Commitment 1 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Grizzly Bear Commitment 1 (p. 49) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 19 (p. 6-67) and No. 43 (p. 6-91) Appendix D-3, Section 1.1.2 (pp. 1-2 to 1-3) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 1.4 (p. 3), Section 3.1 (various)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Please see detailed review comment for Error! Reference source not found..
Recommendation/Request	N/A



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Importance	N/A
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KIA-Commitment-Grizzly Bear 2

Review Comment Number	Grizzly Bear #2: Education and reinforcement of proper waste management practices to all workers and visitors to the site
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Grizzly Bear Commitment 2 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Grizzly Bear Commitment 2 (p. 49) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.1, Revised T&C No. 24 (p. 6-22) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Section 2.1 (p. 4), Section 2.2.6 (p. 10)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Section 2.1 (On-Site Personnel Training and Awareness) and Section 2.2.6 (Mitigation for Attraction) of the 2021 WMMP include the following mitigation and management regarding waste:</p> <ul style="list-style-type: none"> • Training and ongoing education on proper handling/disposal of food and wastes to limit the attractiveness of the Project to wildlife. • A no feeding of wildlife policy. • A waste management plan which includes maintaining the Project site and waste management site in a clean and orderly state, and keeping wildlife out of wastes, including keeping the sea can doors shut at the waste management facility. <p>To address Project Certificate No. 003, Revised T&C No. 24, AEM also explained that waste management practices are reviewed routinely with all staff to ensure wildlife attractants</p>



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	are managed appropriately. As noted in Error! Reference source not found., the KIA suggests adding additional details about training (e.g., frequency of reinforcement) to the WMMP or associated SOP(s).
Recommendation/Request	Please see recommendation/request for Error! Reference source not found..
Importance	Moderate

KIA-Commitment-Grizzly Bear 3

Review Comment Number	Grizzly Bear #3: Implement appropriate waste management protocols, including burning all food wastes in an oil-fired incinerator
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Grizzly Bear Commitment 3 (p. 94) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Grizzly Bear Commitment 3 (p. 49) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Section 1.3 (pp. 2-3), Section 2.2.6 (p. 10), Section 2.8 (p. 14-15) <p>TMAC Resources Hope Bay Project Non-Hazardous Waste Management Plan (December 2017)</p> <ul style="list-style-type: none"> • Table 4.1 (p. 7) <p>TMAC Resources Hope Bay Project Incinerator Management Plan (December 2017)</p> <ul style="list-style-type: none"> • Table 1.2 (p. 4), Section 2.1.1.3 (p. 8), Section 2.1.2 (p. 9), Section 2.4.1.2 (p. 12), Section 4 (p. 17)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	The 2021 WMMP briefly outlines appropriate waste management of relevance to wildlife in Sections 2.2.6 (Mitigation for Attraction) and 2.8 (Infrastructure and Waste



	<p>Management), including those mentioned in Error! Reference source not found. and:</p> <ul style="list-style-type: none"> • Waste will be managed to reduce the potential for attracting wildlife. • Carrion will be removed from roads. • The doors on sea cans will be kept closed at all times to avoid the chance of animals encountering wastes or becoming trapped. • Site attractants are reduced through secure storage and incineration of all food wastes. • Waste management facilities will be constructed to prevent wildlife from entry into storage buildings. <p>Section 1.3 of the WMMP refers to related Project documents and summarizes the relevance of the Hope Bay Non-Hazardous Waste Management Plan (2017) and Incinerator Management Plan (2019) for wildlife mitigation. <i>(Note: the reviewer could not find a 2019 version of the Incinerator Management Plan on the NIRB registry; therefore, references herein are made to the 2017 version developed by TMAC.)</i></p> <p>Table 4-1 of the Non-Hazardous Waste Management Plan indicates that food waste and general kitchen refuse is consolidated into non-PVC plastic bags and incinerated daily. Food cans and containers are washed to remove food residue, segregated by material type at the source, and stored in mega bags. Cooking oil/kitchen grease is placed in steel drums and sealed to prevent wildlife attraction. Both food cans/containers and cooking oil are then stored within sea cans at the Waste Management Facility. Afterward, they are transported off site to a licensed recycling/disposal facility; food cans/containers may also be disposed of in a landfill facility on site.</p> <p>The Incinerator Management Plan provides further details regarding food waste management and prevention of wildlife attraction, as summarized in Section 2.1.1.3: <i>"TMAC is required by the Water Licence and Project Certificate to incinerate food wastes to prevent attraction of wildlife. A comprehensive program exists to educate site personnel on the importance of proper food waste (or other potential attractant) management to ensure animals are not attracted to worksites. All food waste is returned daily to the main camp facilities, so it is captured in the domestic waste stream. Collection and transfer of food wastes is performed so that these attractants are stored safely, moved between facilities</i></p>
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	<i>securely and are burned in the incinerator promptly.” Section 4 notes Contingencies in case temporary stockpiling of burnable domestic waste is required (despite multiple incinerators in operation) – all food waste is packaged and stored securely from access by wildlife until functioning of the incinerator can resume. Table 1.2 also refers to a separate “Kitchen Food and Waste Handling Storage” 2014 document that describes proper handling and storage procedures of food wastes by all personnel at Hope Bay.</i>
Recommendation/Request	The KIA requests/recommends the following: <ul style="list-style-type: none"> • Please upload the latest Incinerator Management Plan (revised March 2019) to the NIRB registry.
Importance	Low

KIA-Commitment-Grizzly Bear 4

Review Comment Number	Grizzly Bear #4: Eliminate attractants (e.g., food waste, oil products) at the landfill site
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Grizzly Bear Commitment 4 (p. 94) NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023) • Appendix A, 2006 Grizzly Bear Commitment 4 (p. 49) Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022) • Appendix D-3, Appendix 2.1-1, Section 3.1.1 (p. 9) TMAC Resources Hope Bay Project Non-Hazardous Waste Management Plan (December 2017) • Table 4.1 (p. 7), Section 3.3 (p. 6) TMAC Resources Hope Bay Project Incinerator Management Plan (December 2017) • Module A: Doris, Conformity Table (p. A-ii)
Proponent’s Compliance Status (From 2021 Annual Report)	AEM’s 2021 Self-Reported Status: Not Active, Not Applicable
Summary	The KIA <i>partially agrees</i> with AEM’s “Not Active Yet, Not Yet Applicable” status for work completed to date.



Detailed Review Comment	As of 2022 annual reporting, the Doris Landfill has not been constructed but is planned to be located on the east side of the TIA. Nonetheless, TMAC's 2017 Non-Hazardous Waste Management Plan discusses materials that may be disposed of in a permitted on-site landfill facility to minimize the amount of non-hazardous waste shipped off site and to reduce transport and management costs. As noted in Error! Reference source not found., food waste and general kitchen refuse are incinerated daily, and cooking oil is transported off site. However, food cans and containers may be disposed of in a landfill facility instead of shipping off site (Table 4.1). If and when this occurs, AEM will need to ensure that food cans/containers are adequately washed to remove all food residue to prevent wildlife attraction to the landfill. It is expected that further details will be provided in the Landfill Management Plan (when developed, as required by Doris' Type A Water Licence).
Recommendation/Request	The KIA requests/recommends the following: <ul style="list-style-type: none"> Please ensure that the Landfill Management Plan (when developed) will address food waste management and minimizing wildlife attraction.
Importance	High

KIA-Commitment-Grizzly Bear 5

Review Comment Number	Grizzly Bear #5: Separation of food waste and non-food waste at source
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Grizzly Bear Commitment 5 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Grizzly Bear Commitment 5 (p. 49) <p>TMAC Resources Hope Bay Project Non-Hazardous Waste Management Plan (December 2017)</p> <ul style="list-style-type: none"> Section 3.1 (p. 5), Table 4.1 (p. 7) <p>TMAC Resources Hope Bay Project Incinerator Management Plan (December 2017)</p> <ul style="list-style-type: none"> Section 2.1.1.1 (p. 6)
Proponent's Compliance Status	AEM's 2021 Self-Reported Status: Active, In Compliance



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(From 2021 Annual Report)	
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Section 3.1 of the 2017 Non-Hazardous Waste Management Plan explains how all wastes segregated at the source to ensure non-hazardous waste streams are handled separately from hazardous waste streams. Section 2.1.1.1 of the 2017 Incinerator Management Plan further explains that only appropriate domestic camp waste is permitted for incineration. All wastes are segregated at the source to ensure non-burnable waste streams do not enter the feed stock for the incinerator.
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Grizzly Bear 6

Review Comment Number	Grizzly Bear #6: Appropriate fencing around the landfill area
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Grizzly Bear Commitment 6 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Grizzly Bear Commitment 6 (p. 49) <p>TMAC Resources Hope Bay Project Incinerator Management Plan (December 2017)</p> <ul style="list-style-type: none"> Module A: Doris, Conformity Table (p. A-ii)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Not Active, Not Applicable
Summary	The KIA <i>agrees</i> with AEM's "Not Yet Active, Not Yet Applicable" status for work completed to date.
Detailed Review Comment	As of 2022 annual reporting, the Doris Landfill has not been constructed. It is expected that details about mitigating wildlife attraction, including fencing to exclude grizzly bears, will be provided in the Landfill Management Plan (when developed, as required by Doris' Type A Water Licence).
Recommendation/Request	The KIA requests/recommends the following:



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	<ul style="list-style-type: none"> Please ensure that the Landfill Management Plan (when developed) will address food waste management and minimizing wildlife attraction.
Importance	High

KIA-Commitment-Grizzly Bear 7

Review Comment Number	Grizzly Bear #7: Burn waste oil in waste-oil furnaces or taken off-site for recycling
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Grizzly Bear Commitment 7 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Grizzly Bear Commitment 7 (p. 49) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Table 10-1 (p. 10-1) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 1.3 (p. 3) <p>TMAC Resources Hope Bay Project Hazardous Waste Management Plan (December 2017)</p> <ul style="list-style-type: none"> Table 4.1 (p. 10) Module B: Windy, Section B1 (p. B-1)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Section 1.3 of the 2021 WMMP refers to related Project documents and summarizes the relevance of the Hope Bay Hazardous Waste Management Plan (2019) for wildlife mitigation. <i>(Note: in Section 10, Table 10-1 of the 2021 NIRB Annual Report, AEM refers to a March 2020 revised version of this plan. However, the reviewer could not find either the 2019 or 2020 document on the NIRB registry; therefore, references herein are made to the 2017 version developed by TMAC.)</i>



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	<p>The Type B Water Licence issued to TMAC by the NWB requires that all hazardous waste, waste oil and non-combustible waste generated through the course of operation be backhauled and disposed of at an approved waste disposal site. Table 4.1 of the Hazardous Waste Management Plan indicates that waste oils, filters, rags, and absorbent pads are placed in clearly labeled containers and consolidated into steel or plastic containers, totes or UN mega bags by Waste Management personnel. They are then stored within sea cans or lined containment at the Waste Management Facility. Waste oil is used in waste oil burner furnaces onsite and residual material from waste oil burners is transported off site to a licensed recycling/disposal facility.</p> <p>AEM should clarify one phrase in the disposal methods – it is currently unclear if the option to be “Transported off site to a licensed recycling/disposal facility” refers to all of the waste material specified (waste oils, filters, rags, absorbent pads) or only the materials that are not waste oil (which would be used in burner furnaces).</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please upload the latest Hazardous Waste Management Plan (revised March 2020) to the NIRB registry. • Please clarify if waste oil is always used in waste oil burner furnaces on site, or if waste oil is sometimes transported off site to a licensed recycling/disposal facility.
Importance	Low

KIA-Commitment-Grizzly Bear 8

Review Comment Number	Grizzly Bear #8: Designate contained areas for worker lunch and coffee breaks
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Grizzly Bear Commitment 8 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Grizzly Bear Commitment 8 (p. 49)



	<p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.1 (p. 4), Section 2.2.6 (p. 10)
<p>Proponent's Compliance Status (From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA is unable to comment on AEM's "Active, In Compliance" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>As noted in review comments Error! Reference source not found., Error! Reference source not found., and Error! Reference source not found., AEM has policies and management actions regarding on-site personnel wildlife awareness and training. However, the reviewer could not find documentation specific to this Commitment. AEM will need to produce evidence of designated contained areas for worker lunch and coffee breaks (e.g., site maps and policies stating that eating and drinking should be done in these areas).</p>
<p>Recommendation/Request</p>	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please provide supporting documentation to demonstrate compliance with this Commitment. For future annual reporting purposes, AEM should include these details in the WMMP and/or associated SOP (e.g., General Site Rules).
<p>Importance</p>	<p>Moderate</p>

KIA-Commitment-Grizzly Bear 9

<p>Review Comment Number</p>	<p>Grizzly Bear #9: Educate people on the risk associated with feeding wildlife and careless disposal of food garbage</p>
<p>References (Report, Section, Page)</p>	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Grizzly Bear Commitment 9 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Grizzly Bear Commitment 9 (p. 49) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.1, Revised T&C No. 24 (p. 6-22)



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	<p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.1 (p. 4), Section 2.2.6 (p. 10)
<p>Proponent's Compliance Status (From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>Please see detailed review comment for Error! Reference source not found..</p>
<p>Recommendation/Request</p>	<p>Please see recommendation/request for Error! Reference source not found..</p>
<p>Importance</p>	<p>Moderate</p>

KIA-Commitment-Grizzly Bear 10

<p>Review Comment Number</p>	<p>Grizzly Bear #10: Ongoing review of the efficacy of the waste management program and adaptive improvement</p>
<p>References (Report, Section, Page)</p>	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Grizzly Bear Commitment 10 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Grizzly Bear Commitment 10 (p. 49) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 3.1.2.1 (pp. 17-18) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix D-3, Table 1 (p. viii), Section 3.6.3.1 (p. 3-37), Section 3.6.4 (p. 3-40), Section 3.8.3.1 (p. 3-52), Section 3.8.4 (p. 3-55), Appendix 2.1-1 <p>TMAC Resources Hope Bay Project Non-Hazardous Waste Management Plan (December 2017)</p> <ul style="list-style-type: none"> Section 1.4 (pp. 2-3), Section 5.2 (p. 9) <p>TMAC Resources Hope Bay Project Incinerator Management Plan (December 2017)</p> <ul style="list-style-type: none"> Section 2.1.1.1 (pp. 6-7), Section 1.5 (p. 5)



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Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>Section 2.1.1.1 of the 2017 Incinerator Management Plan explains that there are regular waste feed inspections, recorded on the appropriate forms, and issues with proper segregation and sorting at source in the waste management stream will be addressed by identifying the source or root cause of the issue, re-enforcing or improving training of site personnel, providing additional labelled receptacles, or implementing other measures as needed. The Incinerator Management Plan is periodically reviewed and updated/revised as required (Section 1.5).</p> <p>The Non-Hazardous Waste Management Plan is reviewed annually and updated as necessary (Section 1.4). Table 1.3 also presents the roles and responsibilities of specific Project staff for plan management and execution. Responsibilities related to review and adaptive improvement include conducting facility and record inspections/audits and identifying and implementing corrective actions as necessary. Section 5.2 indicates that inspections of the facility are performed routinely to ensure good housekeeping and compliance with required standards for storage of non-hazardous waste on site. Waste audits are conducted periodically to ensure proper sorting, labelling, and documentation is conducted by all personnel on site.</p> <p>With respect to wildlife mitigation, the WMMP includes Facilities/Wildlife Interaction Monitoring to monitor sites that may attract wildlife (i.e., waste management areas, landfills, and TIA). The 2021 WMMP Compliance Report summarizes the data recorded at two cameras at the Roberts Bay Waste Management Facility – one grizzly bear walked through the area without stopping or investigating, one common raven (monitored as a nest predator) was recorded during the breeding bird period (May 15 – Aug 15), and there were no wolverines detected. AEM concluded that bears are not generally attracted to the waste site and that current mitigation (including waste management practices) is effective.</p>
Recommendation/Request	N/A



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Importance	N/A
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Breeding Birds & Waterfowl Commitments

KIA-Commitment-Breeding Birds & Waterfowl 1

Review Comment Number	Breeding Birds & Waterfowl #1: Conduct land clearing for site infrastructure (e.g., building pad construction and roads) outside of the breeding season
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Breeding Birds & Waterfowl Commitment 1 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Breeding Birds and Waterfowl Commitment 1 (p. 50) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Table 8-2 (p. 8-20) Appendix D-3, Table 1 (pp. vi-vii) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.5 (pp. 12-13), Section 3.1.10 (p. 23), Section 3.1.11 (pp. 23-24)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Section 2.5 (Construction Management) of the 2021 WMMP indicates that, where feasible, Project vegetation clearing and ground disturbance activities that may disturb wildlife residences (nests and dens) will be avoided during specific/sensitive periods of the year. This includes the breeding season of Upland Birds between May 15 and August 15. However, if avoidance is not possible, pre-clearing surveys will be conducted by qualified personnel to identify upland bird nests or nesting territories that will be avoided, and appropriate buffers (minimum 30 m) will be set up.



	<p>Although the need for pre-construction surveys is noted for waterbirds in Section 3.1.11, waterfowl are not included in Section 2.5 as a selected VC for which ground clearing will be conducted outside the breeding season. There is a discrepancy between the 2021 WMMP and the 2021 NIRB Annual Report: in Table 8-2 of the annual report, AEM lists “Conduct ground clearing outside of sensitive nesting periods for waterbirds” and “Avoidance of known nests or nesting areas” as mitigation measures for waterbirds and shorebirds.</p> <p>The 2021 WMMP Compliance Report indicates that no pre-clearing surveys for nesting birds were conducted in 2021 because no new areas were cleared during the bird breeding season.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please include Waterfowl/Waterbirds in Table 2.5-1 of the WMMP, with appropriate nesting period and minimum buffer.
Importance	High

KIA-Commitment-Breeding Birds & Waterfowl 2

Review Comment Number	Breeding Birds & Waterfowl #2: Prevent nesting on mine infrastructure and man-made structures
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Breeding Birds & Waterfowl Commitment 2 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Breeding Birds and Waterfowl Commitment 2 (p. 50) • Table 3, KIA-NIRB-14 (p. 13) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Appendix D-3 <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Section 2.8 (p. 14) <p>Agnico Eagle Hope Bay Project, Proponent’s Response to Comments Received on the 2021 Annual Report</p>



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	<ul style="list-style-type: none"> KIA-NIRB-14 (pp. 65-66)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>The most relevant infrastructure management measure in the 2021 WMMP regarding this Commitment is that "<i>Buildings are designed and maintained to exclude wildlife including skirting, screens over vents and other protective measures, as needed</i>" (Section 2.8). It is unclear if this measure is intended for mammals, birds, or both.</p> <p>Annual WMMP compliance reports include nest observations. In the 2021 report, two songbird nests were found within active Project areas (Electrical Seacan Laydown – LRP and Millwright Laydown); however, it is unclear if they were nesting on mine infrastructure, equipment, or other human-made structure. In response to our 2021 NIRB Annual Report review comment KIA-NIRB-14, AEM provided additional information about nest monitoring and mitigation, and agreed to include details and outcomes of nests requiring buffers at the Project site in future WMMP Reports.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please clarify if breeding bird nesting observed in 2021 occurred on mine infrastructure or other human-made structures. Please discuss whether additional preventative measures, as per this Commitment, have been or could be applied at the Project site. For example, are there areas or infrastructure (particularly areas that are unsafe or likely to be disturbed) where nesting has repeatedly occurred but could be prevented in the future by use of exclusion or deterrence devices?
Importance	Moderate

KIA-Commitment-Breeding Birds & Waterfowl 3

Review Comment Number	Breeding Birds & Waterfowl #3: If a nest site is established and eggs are present, avoid the nest as much as possible and monitor for nest success
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<p>References (Report, Section, Page)</p>	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Breeding Birds & Waterfowl Commitment 3 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Breeding Birds and Waterfowl Commitment 3 (p. 50) Table 3, KIA-NIRB-14 (p. 13) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Appendix D-3, Appendix 3.2-5 (p. 6) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.5 (pp. 12-13), Section 3.1.10 (p. 23), Section 3.1.11 (pp. 23-24) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <ul style="list-style-type: none"> KIA-NIRB-14 (pp. 65-66)
<p>Proponent's Compliance Status (From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>In Appendix 3.2-5 (Hope Bay Incidental Wildlife Observations, 2021) of the 2021 WMMP Compliance Report, Project staff noted delineating the area around two songbird nests at the at the Project site to prevent disturbance. The KIA requested further information about nest monitoring and mitigation for these nests in our 2021 NIRB Annual Report review comment KIA-NIRB-14. In response, AEM stated that for one nest, "<i>the female [common redpoll] was incubating when the nest was checked in late June. However, the nest was not monitored further during the breeding season and was presumed successful.</i>" For the other nest, "<i>The nest was surveyed on two consecutive days after the buffer was implemented to confirm species identification, however the nest was found empty with no activity after 30-minute surveys both days.</i>"</p> <p>As noted in Error! Reference source not found., the 2021 WMMP includes mitigation to establish appropriate avoidance</p>



	<p>buffers around active nests if needed, with a reference to ECCC's "Establishing buffer zones and setback distances" guidelines (https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html#toc5) and SOP: Doris North Migratory Bird Pre-clearing Survey (ERM 2016). ECCC's guidelines states that <i>"Any occupied nest found should be protected with a buffer zone until the young have permanently left the vicinity of the nest."</i></p> <p>Section 3.1.10 of the WMMP explains that any active upland bird nests will be appropriately buffered, monitored, and the fate of the nest reported. It is assumed that additional details (e.g., monitoring frequency) are available in the referenced pre-clearing survey SOP, Section 2.5. However, there is no mention of active nest monitoring for waterfowl in the WMMP, Section 3.1.11. It is unclear if the Doris North Migratory Bird Pre-clearing Survey SOP applies to both upland birds and waterbirds.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please clarify if active nest monitoring is conducted for waterbirds (including waterfowl) and shorebirds, and if the SOP: "Doris North Migratory Bird Pre-clearing Survey" is intended to apply to these bird VCs. • Please consider distributing the SOP: Doris North Migratory Bird Pre-clearing Survey to the KIA and other interested parties for review.
Importance	High

Raptors Commitments

KIA-Commitment-Raptors 1

Review Comment Number	Raptors #1: Integration of <i>Inuit Qaujimajatuqangit</i> into operations and monitoring programs
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Raptors Commitment 1 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Raptors Commitment 1 (p. 50)



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	<p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 19 (p. 6-67) and No. 43 (p. 6-91) Appendix D-3, Section 1.1.2 (pp. 1-2 to 1-3) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <p>Section 1.4 (p. 3), Section 3.1 (various)</p>
<p>Proponent's Compliance Status</p> <p>(From 2021 Annual Report)</p>	<p>AEM's 2021 Self-Reported Status: Active, In Compliance</p>
<p>Summary</p>	<p>The KIA <i>agrees</i> with AEM's "Active, In Compliance" status for work completed to date.</p>
<p>Detailed Review Comment</p>	<p>Please see detailed review comment for Error! Reference source not found..</p>
<p>Recommendation/Request</p>	<p>N/A</p>
<p>Importance</p>	<p>N/A</p>

KIA-Commitment-Raptors 2

<p>Review Comment Number</p>	<p>Raptors #2: Prevent raptors from nesting on mine infrastructure</p>
<p>References</p> <p>(Report, Section, Page)</p>	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Raptors Commitment 2 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Raptors Commitment 2 (p. 50) Table 3, KIA-NIRB-14 (p. 13) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.2, New T&C No. 27 (p. 6-75) Appendix D-3, Section 3.11.3.2 (p. 3-69) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 2.8 (p. 14) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p>



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	KIA-NIRB-14 (pp. 65-66)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	<p>As noted in review comment Error! Reference source not found., the most relevant infrastructure management measure in the 2021 WMMP regarding this Commitment is that <i>"Buildings are designed and maintained to exclude wildlife including skirting, screens over vents and other protective measures, as needed"</i> (Section 2.8).</p> <p>In addition to the two songbird nests in Project areas in 2021, a rough-legged hawk nest was observed at the Naartok pit. AEM explained in the 2021 WMMP Compliance Report, Section 3.11.3.2, that the pit was not in use during the raptor breeding season and the pair was not monitored closely. Pits and quarries also constitute "mine infrastructure" and deterrents for cliff-nesting raptors may be needed if the excavated areas are actively in use. There is no information in the 2021 WMMP about deterring raptors from nesting on mine infrastructure.</p> <p>The KIA notes that Project Certificate No. 009, New T&C No. 27 includes a provision that a nest-site protection plan, if required, must address <i>"measures for instances where raptors build a nest on project infrastructure such as a service building and cessation of construction activities would not apply"</i>. It is likely that deterrents cannot be applied everywhere and that additional mitigation measures must be implemented for nesting raptors. However, as discussed in Error! Reference source not found., perhaps deterrents can be applied to Project areas or infrastructure where nesting has repeatedly occurred but could be prevented in the future.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please clarify whether measures are taken to prevent raptors from nesting on mine infrastructure, including active pits and quarries, as per this Commitment.
Importance	Moderate



KIA-Commitment-Raptors 3

Review Comment Number	Raptors #3: If a nest is established within the mine footprint and eggs are present, avoid the nest as much as possible and monitor for nest success
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> • Appendix A, Raptors Commitment 3 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> • Appendix A, 2006 Raptors Commitment 3 (p. 50) • Table 3, KIA-NIRB-14 (p. 13) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> • Section 6.2, New T&C No. 27 (p. 6-75) • Appendix D-3, Section 3.11.3.2 (p. 3-69) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> • Section 2.5 (pp. 12-13), Section 3.1.12 (pp. 24-25) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <ul style="list-style-type: none"> • KIA-NIRB-14 (pp. 65-66)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA agrees with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	The requirement for mitigation and monitoring of active cliff-nesting raptors was included in Project Certificate No. 009, New T&C No. 27. Section 2.5 (Construction Management) of the 2021 WMMP indicates that, where feasible, Project vegetation clearing and ground disturbance activities that may disturb wildlife residences (nests and dens) will be avoided during specific/sensitive periods of the year. This includes the breeding season of Raptors between May 15 and August 15. However, if avoidance is not possible, nest surveys of cliff-nesting habitat within 2 km of the construction area will be conducted prior to clearing and construction, and an appropriate buffer (minimum 200 m) will be established around active nest sites. Furthermore, if an active nest site is



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	<p>within 1 km of planned construction areas, a nest site protection plan will be developed in consultation with GN DOE. However, the KIA notes a discrepancy between information presented in Table 2.5-1 and Section 3.1.12 on Monitoring and Evaluation for Raptors, which states that a nest management plan will be written for any raptors discovered nesting within 2 km of planned construction activities.</p> <ul style="list-style-type: none"> With respect to monitoring, Section 3.1.12 also states that active nests of ground-nesting raptors will be monitored weekly and the outcome of the fate of the nest will be reported.
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please correct the discrepancy between Table 2.5-1 and Section 3.1.12 regarding when a raptor nest protection/management plan is needed (i.e., 1 km or 2 km). Please clarify whether a raptor nest site protection plan was produced for the Hope Bay Project. If so, the KIA would be interested in reviewing this document.
Importance	Moderate

KIA-Commitment-Raptors 4

Review Comment Number	Raptors #4: Establishing and enforcing speed limits
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Raptors Commitment 4 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Raptors Commitment 4 (p. 50) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Sections 2.1 (p. 4), 2.2.3 to 2.2.4 (p. 9), 2.6 (p. 13) Tables 2.2-1 (p. 6), Table 2.2-2 (p. 7)
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance



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Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.
Detailed Review Comment	Please see detailed review comment for Error! Reference source not found..
Recommendation/Request	Please see recommendation/request for Error! Reference source not found..
Importance	Moderate

KIA-Commitment-Raptors 5

Review Comment Number	Raptors #5: Reporting all accidental deaths or injury to raptors as a result of vehicle or aircraft collisions, so that mitigation can be adaptive managed
References (Report, Section, Page)	<p>NIRB Final Hearing Report for the Doris North Gold Project (March 2006)</p> <ul style="list-style-type: none"> Appendix A, Raptors Commitment 5 (p. 95) <p>NIRB 2021-2022 Monitoring Report, Doris North Gold Mine and Phase 2 Hope Bay Belt Projects (March 2023)</p> <ul style="list-style-type: none"> Appendix A, 2006 Raptors Commitment 5 (p. 51) Table 3, KIA-NIRB-10 (p. 12) <p>Agnico Eagle Hope Bay Project, 2021 NIRB Annual Report (April 2022)</p> <ul style="list-style-type: none"> Section 6.1, Revised T&C No. 25 (p. 6-23) Section 6.2, New T&C No. 23 (p. 6-71) Table 8-2 (p. 8-19) Appendix D-3, Table 1 (pp. vii, ix), Section 3.2.2 (p. 3-2), Section 3.11.3.1 (p. 3-69), Section 3.11.3.3 (p. 3-70) ; Appendix 2.1-1, Section 4 (p. 22) <p>Agnico Eagle Hope Bay Wildlife Mitigation and Monitoring Plan (April 2021)</p> <ul style="list-style-type: none"> Section 3.1.3 (p. 18), Section 3.2 (p. 25) <p>Agnico Eagle Hope Bay Project, Proponent's Response to Comments Received on the 2021 Annual Report</p> <p>KIA-NIRB-10 (pp. 56-57)</p>
Proponent's Compliance Status (From 2021 Annual Report)	AEM's 2021 Self-Reported Status: Active, In Compliance
Summary	The KIA <i>partially agrees</i> with AEM's "Active, In Compliance" status for work completed to date.



<p>Detailed Review Comment</p>	<p>The requirement to report wildlife injury and mortality incidents and measures (to be) taken for adaptive management is included in Project Certificate No. 003, Revised T&C No. 25, and Project Certificate No. 009, New T&C No. 23. Specifically, the latter states that <i>“The Proponent shall file an incident report with the local wildlife conservation office for all direct wildlife mortalities that occur in association with the Project. Incident reports should include sufficient detail to demonstrate how monitoring and mitigation measures failed to prevent the mortality, as well as information pertaining to what measures would be put in place to prevent the incident from reoccurring.”</i></p> <p>Section 3.1.3 of the 2021 WMMP describes Incident and Mortality Monitoring and provides further details to comply with these Terms and Conditions, including how <i>“These observations will be used to identify any adaptive management required to feed back into the management actions identified in Section 2.”</i></p> <p>In the 2021 NIRB Annual Report, AEM reported on two bird collisions with infrastructure, including one mortality incident of a peregrine falcon, likely due to collision with a fuel storage tank. The KIA commented on bird-building collisions in our review comment KIA-NIRB-10 and recommended additional mitigation measures if high-risk areas are identified. In response, AEM stated that <i>“The two bird incidents in 2021 are currently considered to be stochastic events, and neither location is considered a high-risk collision area. The fuel tank is not lit (lights may disorient birds and increase collision risk), nor does it have any poles, guy wires, or other attachments which may pose a greater collision risk. The redpoll collision with a lab building window was likely due to reflection of the sky against the window, which is difficult to prevent in bright conditions. In the Project’s history, most years do not have any bird collision mortalities. If bird collisions increase to occur at a rate greater than 1 bird species at risk per year (across 3 years), adaptive management will be triggered to assess areas of heightened collision risk and implement additional mitigations.”</i></p> <p>While the KIA appreciates AEM’s elaboration on the Project’s history of bird collisions and plan for adaptive management for at-risk bird species, please note that the requirement for adaptive management to mitigate mortality risks, as per New T&C No. 23, apply for all wildlife and for all situations (e.g.,</p>
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	vehicle or aircraft strikes, as per this Commitment). Triggers for adaptive management could be added to various sections of the WMMP, such as Sections 2.5 through 2.10 in relation to various Project activities.
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please provide further information regarding adaptive management to mitigate wildlife mortality risks and include these details in the WMMP. • For the purposes of reporting on this Commitment, please clarify whether raptor collisions with vehicles or aircraft have occurred within the Project's lifetime, and whether additional mitigation measures were applied afterward.
Importance	Moderate

Archaeology Commitments

KIA-Commitment-Archaeology 1

Review Comment Number	Archaeology #1: All construction activity in the vicinity of the remains will cease immediately.
References (Report, Section, Page)	<p>Hope Bay Project, Nunavut, 2013 Archaeological Investigation Final Permit Report (NU Archaeologist's Permit 2013-018A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations in 2014 At the Hope Bay Project, Nunavut Final Permit Report (NU Archaeologist's Permit 2014-07A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations at the Hope Bay Project, Nunavut in 2015 Final Permit Report (NU Archaeologist's Remit 2025-07A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2016 Final Permit Report (NU Archaeologist's Permit 2016-012A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2019 Final Permit Report (NU Archaeologist's Permit 2019-022A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut 2021 Archaeological Investigations Final Permit Report (NU Archaeologist's Permit 2021-05A), Point West Heritage Consulting Ltd.</p>



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Proponent's Compliance Status (From 2021 Annual Report)	The KIA agrees with AEM's "Active, In Compliance" Status for work completed to date.
Summary	For the past decade, TMAC Resources Inc. and Agnico Eagle Mines Ltd. have maintained an active archaeological program at the Hope Bay Project. Close communication between project geologists, development planners, site environmental coordinators, and with the yearly monitoring program ensured that procedures were implemented to avoid inadvertent site damage to archaeological remains.
Detailed Review Comment	<p>Planned development sites and exploration areas were proactively surveyed with detailed mapping and site assessment for all discovered archaeological sites in order to develop appropriate, site-specific mitigation strategies.</p> <p>On page 40 of the 2013 report the project archaeologist recommended that <i>"In the event of an unanticipated find, all work must cease, and the Territorial Archaeologist must be notified"</i>.</p> <p>To KIA's knowledge, TMAC and Agnico Eagle have complied and implemented the project archaeologist's recommendations, proactively identifying archaeological sites prior to all construction and implementing recommendations.</p>
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Archaeology 2

Review Comment Number	Archaeology #2: The project archaeologist and Territorial Archaeologist will be contacted. Then the potential significance of the remains will be assessed; and mitigative options will be identified.
References (Report, Section, Page)	<p>Hope Bay Project, Nunavut, 2013 Archaeological Investigation Final Permit Report (NU Archaeologist's Permit 2013-018A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations in 2014 At the Hope Bay Project, Nunavut Final Permit Report (NU Archaeologist's Permit 2014-07A) Points West Heritage Consulting Ltd.</p>



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	<p>Archaeological Investigations at the Hope Bay Project, Nunavut in 2015 Final Permit Report (NU Archaeologist's Remit 2025-07A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2016 Final Permit Report (NU Archaeologist's Permit 2016-012A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2019 Final Permit Report (NU Archaeologist's Permit 2019-022A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut 2021 Archaeological Investigations Final Permit Report (NU Archaeologist's Permit 2021-05A), Point West Heritage Consulting Ltd.</p>
Proponent's Compliance Status (From 2021 Annual Report)	<p>The KIA agrees with AEM's "Active, In Compliance" Status for work completed to date.</p>
Summary	<p>For the past decade, TMAC Resources Inc. and Agnico Eagle Mines Ltd. have maintained an active archaeological program at the Hope Bay Project. Close communication between project geologists, development planners, site environmental coordinators, and with the yearly monitoring program ensured that procedures were implemented to avoid inadvertent site damage to archaeological remains.</p>
Detailed Review Comment	<p>Mitigation measures have been recommended by the project archaeologist prior to construction or exploration activities. The annual field archaeologist's report is routinely sent to the Territorial Archaeologist of the Government of Nunavut as well as KIA.</p> <p>To KIA's knowledge, TMAC and Agnico Eagle have complied and implemented the project archaeologist's recommendations, proactively identifying archaeological sites prior to all construction and implementing recommendations.</p>
Recommendation/Request	<p>N/A</p>
Importance	<p>N/A</p>

KIA-Commitment-Archaeology 3

Review Comment Number	<p>Archaeology #3; If the significance of the remains is judged to be sufficient to warrant further action and they cannot be avoided, the project archaeologist in consultation with the</p>
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	Territorial Archaeologist, will determine the appropriate course of action.
References (Report, Section, Page)	<p>Hope Bay Project, Nunavut, 2013 Archaeological Investigation Final Permit Report (NU Archaeologist's Permit 2013-018A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations in 2014 At the Hope Bay Project, Nunavut Final Permit Report (NU Archaeologist's Permit 2014-07A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations at the Hope Bay Project, Nunavut in 2015 Final Permit Report (NU Archaeologist's Remit 2025-07A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2016 Final Permit Report (NU Archaeologist's Permit 2016-012A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2019 Final Permit Report (NU Archaeologist's Permit 2019-022A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut 2021 Archaeological Investigations Final Permit Report (NU Archaeologist's Permit 2021-05A), Point West Heritage Consulting Ltd.</p>
Proponent's Compliance Status (From 2021 Annual Report)	The KIA agrees with AEM's "Active, In Compliance" Status for work completed to date.
Summary	Detailed assessments were conducted by the project archaeologist on previously recorded sites for the past decade and mediation recommendations were subsequently made.
Detailed Review Comment	<p>On page ii of the 2015 report, it states <i>"The planned archaeological field work this season had two major objectives. The main focus was on detailed assessment of previously recorded sites that are located with proposed development areas."</i></p> <p><i>The purpose of this work was to collect sufficient information at each of the sites through careful surface inspection, plan mapping of selected features, and small amounts of focused subsurface testing in order to gain a better knowledge of site content and boundaries. This information is necessary to prepare mitigation plans to be implemented when development go ahead."</i></p> <p>On page 27 of the 2015 report, it states <i>"Inventory survey to date have been completed by combinations of low-level aerial</i></p>



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	<p><i>and on-ground reconnaissance. Not all surveys have been conducted to the same level of intensity; survey intensity has been dependent on type of activity proposed...</i></p> <p><i>Consequently, a final intensive reconnaissance of any proposed infrastructure components prior to initiation of construction is strongly recommended."</i></p> <p><i>"All recommended site mitigation must be completed prior to any project related ground disturbance."</i></p>
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Archaeology 4

Review Comment Number	Archaeology #4: In the case of human remains, the RCMP will be contacted. In addition, a Coroner and/or physical anthropologist, representative of local communities as well as the Inuit Heritage Trust will be consulted to determine how to handle the remains.
References (Report, Section, Page)	<p>Hope Bay Project, Nunavut, 2013 Archaeological Investigation Final Permit Report (NU Archaeologist's Permit 2013-018A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations in 2014 At the Hope Bay Project, Nunavut Final Permit Report (NU Archaeologist's Permit 2014-07A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations at the Hope Bay Project, Nunavut in 2015 Final Permit Report (NU Archaeologist's Remit 2025-07A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2016 Final Permit Report (NU Archaeologist's Permit 2016-012A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2019 Final Permit Report (NU Archaeologist's Permit 2019-022A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut 2021 Archaeological Investigations Final Permit Report (NU Archaeologist's Permit 2021-05A), Point West Heritage Consulting Ltd.</p>
Proponent's Compliance Status (From 2021 Annual Report)	The KIA agrees with AEM's "Active, In Compliance" Status for work completed to date.



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Summary	None of the project archaeologist's annual reports from 2013 to 2021 indicates that human remains were ever found at the Hope Bay Project.
Detailed Review Comment	No comment.
Recommendation/Request	N/A
Importance	N/A

KIA-Commitment-Archaeology 5

Review Comment Number	Archaeology #5: An education program will ensure that all personnel involved in exploration and development activities are aware that all personnel involved in exploration and development activities are aware that heritage resources are protected by law and that if any archaeological, historic or human remains are uncovered during any such activities, these remains must be reported, and disturbance must cease until the remains are dealt with appropriately. The Territorial Archaeologist of the Government of Nunavut will be notified, and a qualified will assess the incident.
References (Report, Section, Page)	<p>Hope Bay Project, Nunavut, 2013 Archaeological Investigation Final Permit Report (NU Archaeologist's Permit 2013-018A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations in 2014 At the Hope Bay Project, Nunavut Final Permit Report (NU Archaeologist's Permit 2014-07A) Points West Heritage Consulting Ltd.</p> <p>Archaeological Investigations at the Hope Bay Project, Nunavut in 2015 Final Permit Report (NU Archaeologist's Remit 2025-07A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2016 Final Permit Report (NU Archaeologist's Permit 2016-012A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut Archaeological Investigations in 2019 Final Permit Report (NU Archaeologist's Permit 2019-022A), Points West Heritage Consulting Ltd.</p> <p>Hope Bay Project, Nunavut 2021 Archaeological Investigations Final Permit Report (NU Archaeologist's Permit 2021-05A), Point West Heritage Consulting Ltd.</p>
Proponent's Compliance Status (From 2021 Annual Report)	The KIA partially agrees with AEM's "Active, In Compliance" Status for work completed to date.



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Summary	To the KIA's knowledge, TMAC and Agnico Eagle have acted upon the project archaeologist's recommendations
Detailed Review Comment	On page 40 of the 2013 report the project archaeologist recommended that <i>"there be continuing education to promote employee and contractor awareness of the presence and importance of archaeological sites."</i>
Recommendation/Request	AEM indicate to NIRB where specifically in the management plans or other documents that employees have been made aware that archaeological sites are protected by law, that they must be reported, and not disturbed.
Importance	Moderate.

Thank you.

John Roesch, P.Eng.

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

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