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June 23, 2025

NIRB File #: 11MN034

Sent VIA Email: info@nirb.ca

Re: Comment Request for Agnico Eagle's Meliadine Project 2024 Annual Report

Hello Keith,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the 2024 Annual Report for Agnico Eagle's Meliadine Project, NIRB File #: 11MN034.

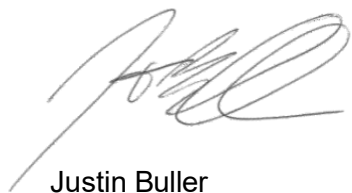
The GN has reviewed the 2024 Annual Report and related documents and has six (6) comments, attached to this letter, to raise with the Board at this time. These comments are primarily concerned with data gaps, missing information, and additional analysis needed within mitigation and monitoring plans.

The GN has also included a list of recommended revisions to the 2025 Terrestrial Environment Mitigation and Monitoring Plan (TEMMP) (attached as Appendix 1). These changes are included here because the 2024 Annual Report includes a revised version of the 2025 TEMMP that does not incorporate several mitigation and monitoring measures previously recommended by the GN to prevent adverse effects on caribou.

Noting the combination of an atypically short review period with the concurrent review of 4 other annual reports, the GN may have a subsequent submission related to this Annual Report. The GN recognizes that any supplementary comments would not be addressed in the context of revisions to this Annual Report. However, we would hope the proponent would take steps to address any additional comments over the next year and provide an update on progress made in the 2025 Annual Report.

The GN appreciates participating in ongoing project monitoring through the NIRB process. Should there be any concerns or need for follow-up, please feel free to contact me at jbuller@gov.nu.ca.

Thank you,



Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN AR # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Raptor Surveys
Terms and Conditions	59, 71, 72 (Project Certificate No. 006, Amendment No. 2)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meliadine Division. Appendix 26: 2024 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2025) • Agnico Eagle Mines Limited – Meliadine Division. Terrestrial Environment Management and Monitoring Plan. Version 4 (April 2022) • Agnico Eagle Mines Limited – Meliadine Division. Opportunity to Address Comments Received for Agnico Eagle Mines Limited's Meliadine Gold Mine Project 2023 Annual Report (July 2024) • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mine's Meliadine Project 2023 Annual Report. (June 2024).
IDENTIFICATION OF ISSUE	
<p>The Government of Nunavut (GN) notes that Agnico Eagle Mines Limited's (AEM or the Proponent's) 2024 Terrestrial Environmental Management and Monitoring Plan Annual Report (2024 TEMMP Annual Report) does not provide detailed information on raptor nest productivity, despite this being identified as an objective in the Project's 2022 Terrestrial Environmental Management and Monitoring Plan* (2022 TEMMP). AEM had stated that this information would be incorporated into the 2024 Annual Report (AR) but it has not been included.</p> <p><i>*The GN recognizes that the Proponent has submitted Version 5 of the TEMMP as part of its annual report materials. However, the 2022 TEMMP would have been in force at the time of the 2024 AR preparation.</i></p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	

Per section 4.9.2 of the 2022 TEMMP, the raptor monitoring program has the following objectives:

“The raptor monitoring program will be completed on an annual basis with the following objectives:

- annual occupancy survey of all known nesting sites;
- first year survey of high-quality habitat to search for new nesting sites;
- monitor distribution and breeding density;
- monitor clutch size and productivity; and
- marking individual adults and nestlings to identify site fidelity and mortality causes.” (AEM, 2022, p.56)

In its review of the 2023 Meliadine Annual Report, the GN noted that the Proponent did not include an analyses of nest productivity (GN AR # 02: Raptor Surveys; GN, 2024). In response to the GN’s comment, the Proponent stated the following:

“This analysis was not included in the 2023 report to remain consistent with the analysis conducted in 2022 and because the data collected to date are current insufficient. Agnico Eagle anticipates additional analysis will be possible following 2024 monitoring and will report on it in the 2024 Annual Report.” (AEM, 2024, p. 15)

The GN notes that the 2024 TEMMP Annual Report presents an analysis of 2022–2024 raptor data to assess whether nest occupancy is influenced by proximity to Project-related disturbance (AEM, 2025, p. 78–103). The 2024 TEMMP Annual Report also includes a limited analysis of productivity (AEM, 2025, p. 89). However, this analysis does not evaluate productivity in relation to distance from disturbance sources.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent:

1. Analyze raptor nest productivity relative to Project-related disturbance sources.
2. Clarify why the 2024 TEMMP Annual Report lacks this analysis, and if data limitations are a factor, outline plans for future data collection.

GN AR # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Caribou Behavior Monitoring – Categorical/Continuous Variables
Terms and Conditions	57 (Project Certificate No. 006, Amendment No. 2)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meliadine Division. Appendix 25: 2023 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2024) • Agnico Eagle Mines Limited – Meliadine Division. Appendix 26: 2024 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2025) • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mine’s Meliadine Project 2023 Annual Report. (June 2024).
IDENTIFICATION OF ISSUE	
<p>In its review of the 2023 Meliadine Annual Report (2023 AR), the Government of Nunavut (GN) identified a potential negative bias caused by using categorical distances bins to analyze the relationship between caribou behaviour and proximity to project roads or disturbances in the Project’s Caribou Behaviour Monitoring Program (GN AR #04 – Caribou Behavior Study Design; GN, 2024).</p> <p>In the 2024 TEMMP Annual Report, the Proponent addressed the GN’s concern by modeling “distance from caribou to infrastructure... as a continuous variable” for the updated Caribou Behaviour Monitoring Program analysis (AEM, 2025, p. 146).</p> <p>The 2024 TEMMP Annual Report confirmed that distance was a highly significant factor influencing the proportion of caribou exhibiting response behaviors (AEM, 2025, p. 160). However, the Proponent did not use these findings to estimate the maximum distance at which caribou visibly respond to project roads or disturbances.</p> <p>Understanding the maximum distance at which caribou visibly respond to Project infrastructure and disturbance is critical for effective adaptive management and the GN’s</p>	

assessment of whether the mitigations and monitoring the Proponent is undertaking are effective for reducing any impacts to caribou from the Project.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The GN, in its review of the 2023 AR, the GN noted the following:

“The GN acknowledges that the use of distance bins may be necessary to retain power when sample sizes are low; However, the results of analyses can be biased by the number and size of the bins utilized. In the case of Project’s caribou behaviour study, Figure 6.3-1 of Appendix F illustrates that most of the survey observations occurred in the 300-1000 and >1000m bins (Page 15). These are the two largest bins in terms of distance intervals. By pooling a majority of the data into these relatively large bins, the analyses may have underestimated the effect of distance on caribou response behaviour thus losing important information relevant to Project effects and the effectiveness of mitigation.” (GN, 2024, pp. 8–9)

To address this concern, the GN recommended the following:

“In accordance with the GN’s recommendation (GN #03) for the 2022 TEMMP annual report (GN, 2023), future analyses of the caribou behaviour monitoring data should treat distance from infrastructure as a continuous variable or, if sample size is insufficient, additional bins should be used in the 300-1000m and >1000m ranges.” (GN, 2024, pp. 9)

Because the Proponent’s analyses grouped data into large bins, the analyses do not provide a full picture of how distance affects caribou behavior, particularly between 300 m to 1000 m and at distances greater than 1000 m from Project infrastructure. The inclusion of additional bins helps prevent important details about the Project’s potential impact and the effectiveness of mitigations from being lost.

In 2024 TEMMP Annual Report, the AEM addressed the GN’s recommendation by treating distance as a continuous variable (e.g., AEM, 2025, p. 146) and reported the following:

“For the response models, there is a significant effect of distance to infrastructure. This suggests a change in behaviour that occurs more strongly when caribou are closer to roads or the Mine site.” (AEM, 2025, p. 163)

However, this finding is not explored further to re-estimate the maximum distance at which caribou respond to project infrastructure/disturbances. Instead, the report concludes that:

“Categorical distance analyses conducted in previous years (2021 to 2023) suggest a change in the response proportion at approximately 300 m distance from the AWAR, with those closest exhibiting a higher proportion of response behaviour (ERM 2024b).” (AEM, 2025, p. 163)

However, the GN emphasizes that this reference relies on the same analysis the GN critiqued in its review of the 2023 AR.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent undertake the following:

- 1) Use the results of the 2024 Caribou Behaviour Monitoring Program to estimate the maximum distance at which caribou behaviour is affected by infrastructure and traffic. In doing so, provide estimates for ‘response’ and ‘response+walking’ behaviours and present the results graphically where possible.
- 2) Repeat the categorical distance analysis conducted in previous years using data up to and including 2024 and with additional bins in the 300–1000m and >1000m ranges.

GN AR # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Caribou Behaviour Study – Walking
Terms and Conditions	57 (Project Certificate No. 006, Amendment No. 2)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meliadine Division. Appendix 26: 2024 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2025)
IDENTIFICATION OF ISSUE	
<p>In the 2024 TEMMP Annual Report, the Proponent describes the methods and results of the Project's 2024 Caribou Behaviour Monitoring Program.</p> <p>To strengthen the interpretation of caribou behavioural data, the GN recommends refining the study methods, by collecting more detailed information on the “walking” behavioural category. Additional information in this area will help the Proponent, the GN and others reviewing future Caribou Behaviour Monitoring Program reports determine whether walking reflects a response or non-response to disturbance from the Project.</p> <p>This information will help the GN determine whether the mitigations, monitoring and management being implemented by the Proponent to avoid or limit impacts to caribou are effective.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>As detailed in the 2024 TEMMP Annual Report, the Proponent incorporated walking as a behaviour category in the 2024 Caribou Behaviour Monitoring Program and defined it as “...similar to standing posture but moving at a slow gait (<5 km/h) ...” (Agnico Eagle, 2025, p. 181).</p> <p>With respect to this behaviour category, the 2024 Caribou Behaviour Monitoring Program stated the following:</p> <p>“...[b]oth response only and walking, in addition to response models, showed an increased proportion of response closer to infrastructure. This supports the</p>	

continued consideration of walking behaviour as a potential response to disturbance for caribou.” (Agnico Eagle, 2025, p. 168)

And

“...[c]aribou were statistically more likely to be walking (a potential response or non-response variable), alert, or running within survey intervals where there was a disturbance (i.e., vehicle traffic). Inclusion of walking as a potential response behaviour may represent a milder response to disturbance events than the other two behaviours, representing a spectrum of possible reactions when disturbed...” (AEM, 2025, p. 169)

The GN believes that collecting additional information, such as direction of travel by caribou, could help determine whether walking behaviour of caribou represents a response or non-response to disturbance from the Project.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent revise the study design and collect data that classifies walking behaviour as movement toward, away from, or parallel to roads or other disturbance sources.

GN AR # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Noise Analysis
Terms and Conditions	57 (Project Certificate No. 006, Amendment No. 2)
References	<ul style="list-style-type: none"> • Agnico Eagle Meliadine Gold Mine. Analysis to Determine Where Caribou May Hear Meliadine Noise [Presentation] (March 2024a) • Agnico Eagle Mines Limited – Meliadine Division. Appendix 26: 2024 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2025a) • Agnico Eagle Mines Limited – Meliadine Division. Appendix 29-17: Terrestrial Environment Management and Monitoring Plan. Version 5 (March 2025b) • Agnico Eagle Mines Limited – Meliadine Division. Appendix 38: 2024 TAG Annual Report (March 2025c) • Agnico Eagle Mines Limited. Meliadine Gold Mine – Comparison of Noise Emissions for Site Shutdown Scenarios. Technical Memorandum (January 2024b)
IDENTIFICATION OF ISSUE	
<p>In the 2024 TEMMP Annual Report, the Proponent summarizes the results of a noise analysis previously presented to the Project's Terrestrial Advisory Group (TAG) in late 2023 and early 2024. The analysis examined noise emissions across varying levels of operations (resulting from adaptive mitigation), in relation to caribou hearing thresholds and the effects of environmental factors. In reviewing this analysis (i.e., the summary and supporting documentation), the GN has identified several concerns related to the study's methods, limitations, and utility in informing adaptive management.</p> <p>Responses from the Proponent with respect to this issue would help provide information necessary for the GN to better assess the impacts from the Project on caribou and evaluate the efficacy of the Proponent's mitigation, management and monitoring programs.</p>	

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The 2024 TEMMP Annual Report includes a summary of the noise analysis previously presented to the Project's TAG in late 2023 and early 2024 (AEM, 2024a; AEM, 2024b; AEM, 2025c). In reviewing this information, the GN notes the following concerns:

Selection of windspeed bands.

The noise analysis, as detailed in the 2024 TEMMP Annual Report, examined how wind-related noise may mask Project-related noise, reducing the distance at which caribou can detect it. The model used four windspeed bands (Figure 6; AEM, 2025a, p.38), with the lowest band (<8.2 km/h) based on the threshold for insect harassment (AEM, 2025, p. 37). However, the 2024 TEMMP Annual Report does not explain the rationale for the remaining bands, which vary in width and are not evenly distributed (Figure 6; AEM, 2025a, p.38). The widest band (8.2–21.6 km/h) accounts for approximately 62% of wind conditions from May to August, yet the analysis does not explore how results may vary with different band groupings (Figure 7; AEM, 2025a, p.39).

The GN believes that conducting the analysis with alternate windspeed bands could help assess sensitivity and improve relevance for caribou protection.

Additionally, the GN notes that while the <8.2 km/h band is reasonable for considering insect harassment in summer, it is not applicable during key sensitive periods for caribou, such as calving and post-calving.

Comparison of noise results to triggers for caribou protection

The Project's 2025 TEMMP uses a four-tiered system that increases monitoring and reduces mine operations as caribou approach the site; however, operational reductions only occur when 50 or more caribou are within 5 km of the mine (AEM 2025b, p. 62). Figures presented to the TAG in March 2024 (reproduced below for convenience; AEM, 2024a) shows that caribou detection of full operational noise is possible from over 10 km away in low winds (Figure 1) and up to 5 km away in moderate winds (Figure 2). Even when operations are suspended, noise may remain audible up to 10 km during low wind periods (Figure 3). These findings may suggest the current 5 km threshold for reducing operations is insufficient to minimize disturbance, particularly for calving and post-calving caribou.

Figure 1. Source: AEM, 2024a

FULL OPERATIONS / WIND SPEED <8.2 KM/H

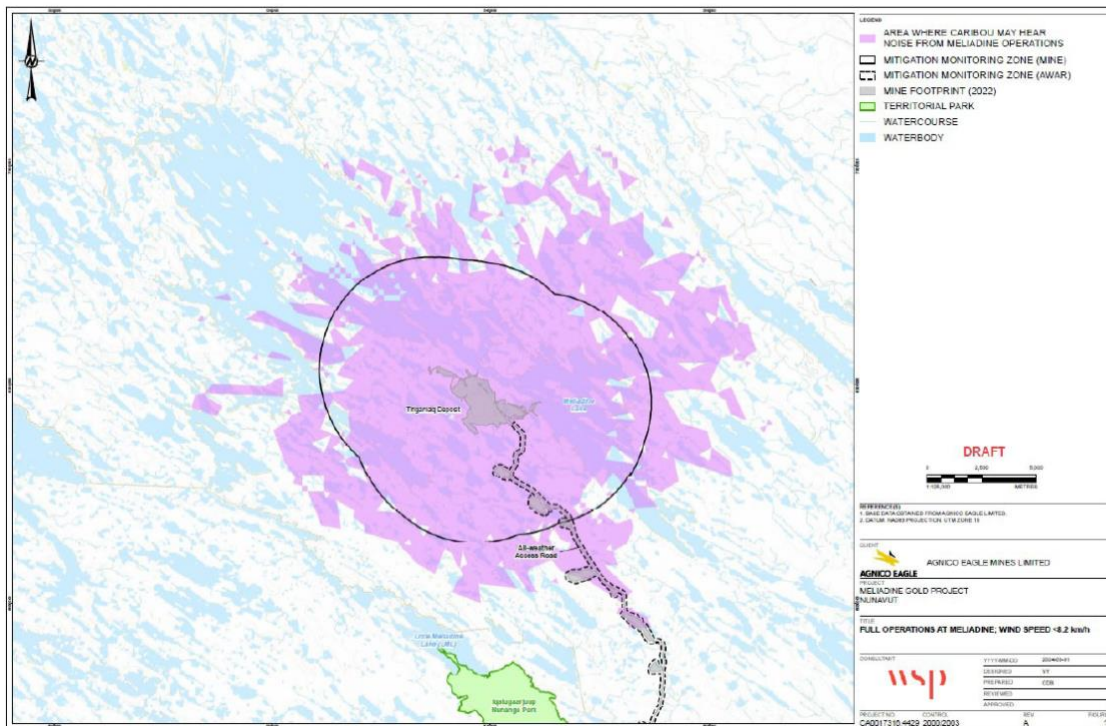


Figure 2. Source: AEM, 2024a

FULL OPERATIONS / WIND SPEED 8.2 – 21.6 KM/H

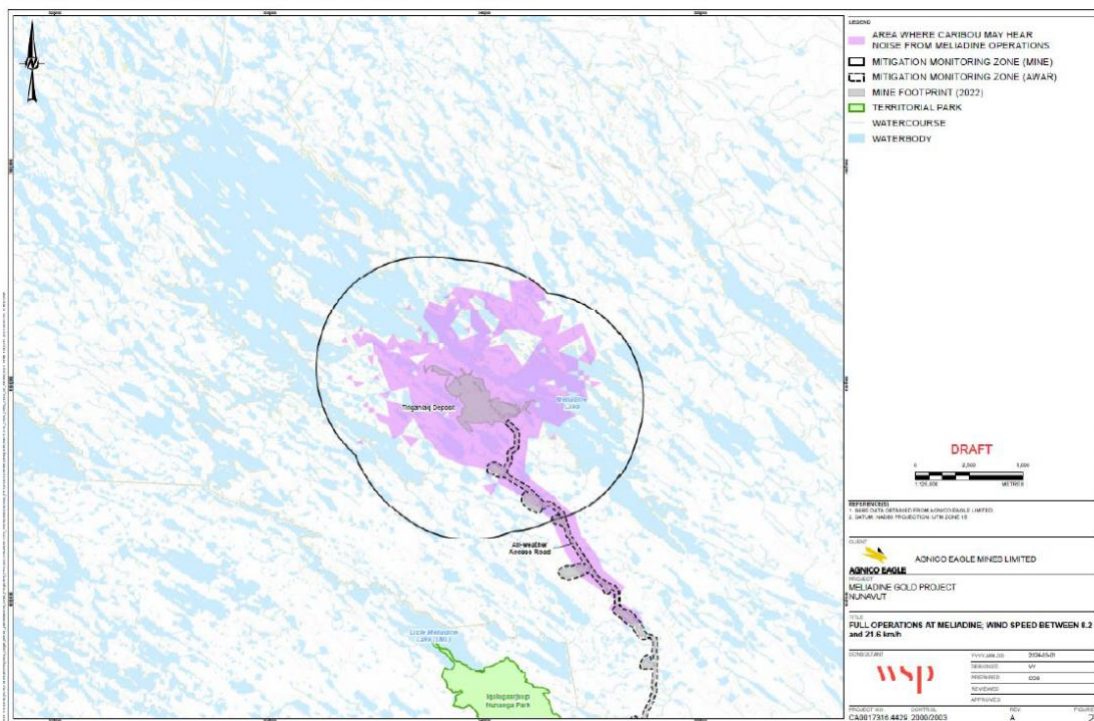
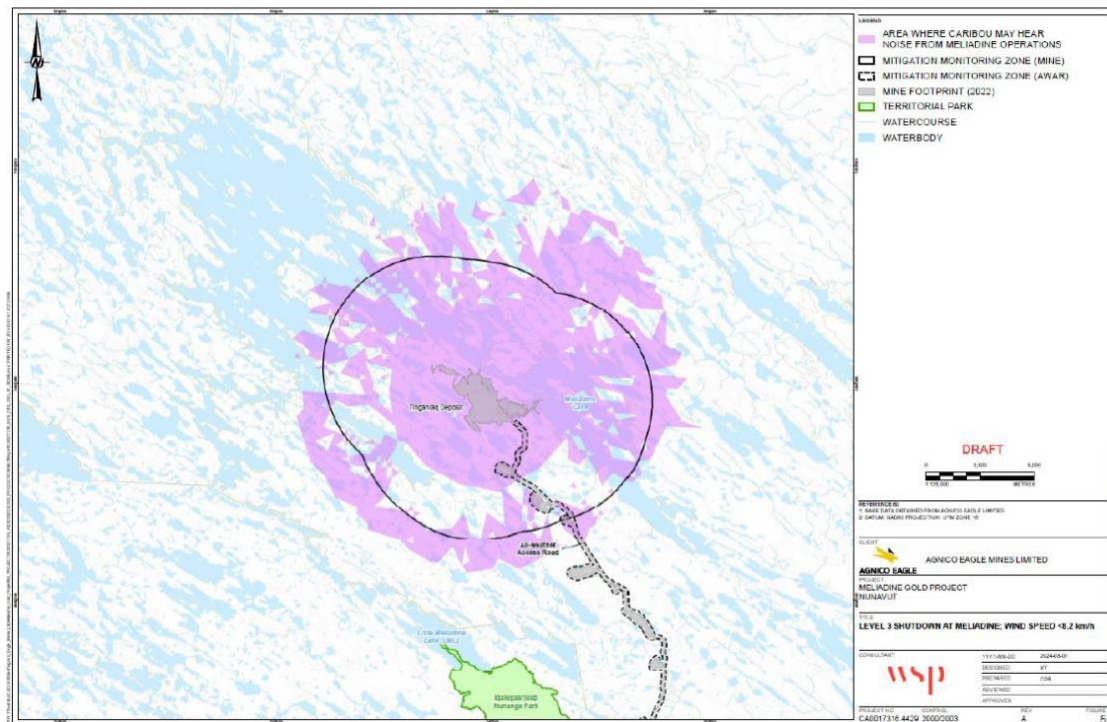


Figure 3. Source: AEM, 2024a

LEVEL 3 OPERATIONS / WIND SPEED <8.2 KM/H



Drilling and other on-the-land activities

The noise analysis appears to be constrained to modeling noise generated by the mine and the All-Weather Access Road (AWAR) but does not seem to account for noise emissions from drilling sites and other Project-related activities occurring on the land around the mine. These have the potential to expand the audible footprint of the Project beyond that presented by the Proponent.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends the Proponent:

1. Provide supporting rationale for the selection of each windspeed band used in the noise analysis.
2. Conduct a sensitivity analysis using alternative windspeed band groupings to evaluate how these affect the estimated distance and duration that caribou may be able to hear Project noise.

The GN requests the Proponent:

1. Clarify how noise from drilling operations and helicopter flights on the land surrounding the mine was considered in the 'full operations' scenarios. If these sources were excluded, revise the analysis accordingly and include updated maps and figures.
2. Explain how the current 5 km threshold for suspending mine operations is protective of calving and post-calving caribou, in light of the findings presented in the Proponent's noise analysis.

GN AR # 05	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Information Needed to Assess Compliance with TEMMP
Terms and Conditions	10, 44, 47, 56, 118, 132 (Project Certificate No. 006, Amendment No. 2)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meliadine Division. Appendix 29-17: Terrestrial Environment Management and Monitoring Plan. Version 5 (March 2025a) • Agnico Eagle Mines Limited – Meliadine Division. Appendix 26: 2024 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2025b) • Nunavut Impact Review Board. 2023-2024 Monitoring Report - Meliadine Gold Mine Project, Project Certificate No. 006, Agnico Eagle Mines Limited. NIRB File No. 11MN034. (March 2025)
IDENTIFICATION OF ISSUE	
<p>The GN notes that the 2024 TEMMP Annual Report is missing information necessary for the GN to assess compliance with the 2022 TEMMP, which was in effect during the reporting period.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Project's 2022 TEMMP, in effect during the 2024 reporting period, included requirements concerning flight heights (e.g., section 3.1.2.1), and restrictions on helicopter usage (e.g., section 4.2.2.4) and road traffic on the AWAR (e.g., 4.2.2.5) to mitigate and manage impacts to caribou and other wildlife species.</p> <p>While the 2024 TEMMP Annual Report provides some information on mitigation and management undertaken in 2024 (e.g., Table 30; AEM, 2025, p.87–88), the GN needs additional information to support assessments of the Proponent's compliance with the 2022 TEMMP. For example, the GN notes that the Proponent has not provided any specific summary information regarding helicopter or aircraft activity associated with the</p>	

Project. Notably, the Nunavut Impact Review Board (NIRB) has requested the Proponent to provide helicopter information:

“In review of the 2023 Annual Report, NIRB Staff noted that the Helicopter Flight information for the Meliadine Project was not provided as part of the 2023 Annual Report, creating challenges for the Board and Parties to make conclusions regarding potential impacts to wildlife as well as determine the effectiveness of mitigation measures. NIRB Staff are requesting that the 2023 Helicopter flight be included in the 2024 Annual Report along with subsequent years of data in future reports.” (NIRB, 2025, pg. 28)

The GN believes that additional information is essential for ensuring the past year’s compliance with the 2022 TEMMP. Furthermore, the GN believes this information is necessary to evaluate future years compliance with the 2025 TEMMP (particularly with respect to Level 3 and Level 4 Work suspensions occurring at drills sites or camps).

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Provide maps and other information detailing flight paths, flight length and flight height (m) for 2024 and in future annual reports.
2. Pursuant to the 2025 TEMMP, in future annual reports, for each Level 3 or Level 4 work suspension impacting drills sites or camps, provide maps and other information indicating the (a) the location(s) of caribou that trigger the work suspension; (b) the locations of all manned drill sites or camps, and (c) the flight paths and altitude data for all Project-related helicopter flights that occurred following the initiation of the work suspension until the suspension is lifted.

GN AR # 06	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Terrestrial Ecosystem Management and Monitoring Plan (v5)
Terms and Conditions	43 (Project Certificate No. 006, Amendment No. 2)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Meliadine Division. Appendix 29-17: Terrestrial Environment Management and Monitoring Plan Version 5 (March 2025)
IDENTIFICATION OF ISSUE	
<p>The 2024 TEMMP Annual Report includes a revised version of the Project's TEMMP (i.e., the 2025 TEMMP). The 2025 TEMMP was developed by the Proponent in consultation with the Project's TAG through a series of in-person and remote meetings, along with multiple rounds of verbal and written feedback from TAG members from 2023 to 2025.</p> <p>The 2025 TEMMP does not incorporate several mitigation and monitoring measures previously recommended by the GN to prevent adverse effects on migration caribou, particularly during calving and post-calving periods. Given that several concerns the GN raised with respect to the 2025 TEMMP remain outstanding, the GN did not support the finalization of the document and notes that this version did not receive unanimous support from the TAG.</p> <p>If there is not an agreed-upon standard between parties regarding the appropriate mitigation and monitoring measures to be employed by the Proponent, it is difficult for the GN to assess the efficacy of mitigation measures in reducing impacts from the Project on the terrestrial environment, including wildlife.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The 2024 TEMMP Annual Report includes a revised version of the Project's TEMMP (i.e., the 2025 TEMMP) (AEM, 2025). As detailed in the 2024 TEMMP Annual Report, updating the TEMMP was a central focus of the TAG from 2023–2025 entailing numerous meetings and revisions (AEM, 2025, pp. 2–5).</p>	

The GN notes that the 2025 TEMMP has not received unanimous support from the TAG. However, the Proponent indicated that the 2025 TEMMP would be submitted with the 2024 annual report materials (AEM, 2025, p. 6–7).

The GN believes that the 2025 TEMMP does not incorporate several mitigation and monitoring measures previously recommended by the GN to prevent adverse effects on migration caribou, particularly during calving and post-calving periods. The GN has attached these previous recommendations as Appendix 1.

REQUEST(S)/RECOMMENDATION(S)
Recommendations for revision to the 2025 TEMMP are attached as Appendix 1.

GN APPENDIX 1

GN Review Comment # 01 (GN-RC-01)

References

- Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 1.2.1 NIRB Project Certificate Terms and Conditions
- Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022)

Concerns

As written, the current Terrestrial Environment Management and Monitoring Plan (TEMMP) states, “Caribou and Muskox – Include monitoring for caribou in the Regional Study Area (RSA) (TC-44), regional monitoring (TC-45), share information with the Government of Nunavut (TC 47), allow safe passage of caribou across roads (TC-54), conduct winter and summer monitoring for caribou (TC-118), plan to deter caribou attracted to roads (TC-119) and monitor for muskox (TC 52)” (Page 1).

The GN has concerns regarding Terms and Conditions (TC) 44, 45, and 118 as referenced above.

TC 44 of Project Certificate No. 006, Amendment No. 002 (Project Certificate) states that:

“In consultation with the Government of Nunavut (GN) and other relevant parties, such as the Terrestrial Advisory Group, the Proponent shall further develop its Terrestrial Environment Management and Monitoring Plan (TEMMP) to include increased caribou monitoring across the regional study area and additional details on the scope and design of monitoring programs. The Proponent shall also demonstrate consideration for contributing to existing and planned regional monitoring initiatives associated with terrestrial wildlife and wildlife habitat and the incorporation of Inuit Qaujimaningit, Inuit Qaujimagatuqangit, Traditional and Community Knowledge, as appropriate. Monitoring should be adequate to test impact predictions, monitor impact thresholds and trends over time, and to support implementation of mitigation measures as proposed in the Final Environmental Impact Statement and any subsequent Addenda submitted by the Proponent. The Proponent in consultation with the Terrestrial Advisory Group shall revise the 2021 Technical Memorandum entitled “Collared Caribou Meliadine All-Weather Access Road Interactions” describing the crossings and deflections of caribou in relation to the all-weather access road as assessed using

	<p>caribou collar data and shall provide a copy to the NIRB prior to construction/installation of the waterlines.”</p> <p>Emphasis added</p> <p>TC 45 states that: <u>“The Proponent shall demonstrate consideration for cooperating with existing and planned regional and/or community-based monitoring initiatives associated with terrestrial wildlife and wildlife habitat that produce information pertinent to mitigating project-induced impacts.</u> The Proponent shall give special consideration for supporting regional studies of population health and harvest programs for Qamanirjuaq caribou which help address areas of uncertainty for Project impact predictions.”</p> <p>Emphasis added</p> <p>Finally, TC states that: <u>“The Proponent shall include in an updated Terrestrial Wildlife Management and Monitoring Plan (TEMMP), plans for increased caribou monitoring efforts including weekly winter track surveying and summer and fall surveys undertaken on foot twice per month. These results shall be reported to the NIRB with the Proponent’s annual reporting requirements. The Proponent shall, in consultation with the Terrestrial Advisory Group or appropriate parties, develop a decision tree outlining mitigation and monitoring steps to be implemented when caribou in specified group sizes are observed within specified distances of the Meliadine Gold Mine’s (the Project) AWAR and waterlines.”</u></p> <p>Emphasis added</p> <p>As written, this version of the TEMMP does not clearly demonstrate:</p> <ul style="list-style-type: none"> - How the Proponent has increased caribou monitoring across the regional study area and contributed to existing and planned regional monitoring initiatives (TC 44 and TC 45). - How levels of monitoring are adequate to test impact predictions, monitor impact thresholds and trends over time, and to support implementation of mitigation measures (TC 44). - Methods for undertaking weekly winter track surveys (TC 118).
Recommendations	<p>The GN recommends that the TEMMP be edited to:</p>

	<ul style="list-style-type: none"> - include a dedicated section/subsection demonstrating how the Proponent has increased caribou monitoring across the regional study area and contributed to existing and planned regional monitoring initiatives (TC 44 and TC 45). Regarding the latter, the Proponent should detail the past and planned financial and in-kind contributions to existing and planned regional monitoring initiatives. - include a dedicate section/subsection demonstrating how the levels of monitoring are adequate to test impact predictions, monitor impact thresholds and trends over time, and to support implementation of mitigation measures (TC 44). - describe methods for undertaking weekly winter track surveys (TC 118). <p>Additionally, the GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.</p>
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GN Review Comment # 02 (GN-RC-02)	
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – Table 1: List of Regional Initiatives • Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022)
Concerns	<p>Table 1: List of Regional Initiatives states Agnico Eagle is “Supporting the Government of Nunavut’s caribou satellite-collaring program for the Qamanirjuaq herd (and other herds in the Kivalliq Region that may interact with the Mine), facilitating monitoring of cumulative effects at the herd level” (Page 3).</p> <p>AEM’s support of the GN’s collaring program has relevance to Project Certificate TCs 44 and 45 with respect to regional-scale monitoring and monitoring to test impact predictions, impact thresholds and trends over time. However, as written, the TEMMP does not provide specific details as to how AEM has supported the GN’s collaring program since the Project began.</p>
Recommendations	<p>The GN recommends Agnico Eagle provide additional information regarding their support of the GN’s caribou satellite-collaring program.</p>

	<p>The Proponent should detail the past and planned financial and in-kind contributions made to this program since the Project began.</p> <p>Additionally, the GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.</p>
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GN Review Comment # 03 (GN-RC-03)

References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 1.2.4 Terrestrial Advisory Group • Agnico Eagle – Meliadine Mine Terrestrial Advisory Group Terms of Reference (February 2023)
Concerns	<p>As written, section 1.2.4 Terrestrial Advisory Group, suggests that TAG's advice or input are incorporated into the TEMMP. However, TAG's Terms of Reference (TOR) states, "Agnico Eagle will consider implementation of any advice made by a majority of all Parties of the TAG (TAG Advice)" (AEM, 2023). As such, AEM is not required to incorporate TAG advice in TEMMP revisions even if a majority of its members are in favor of such.</p>
Recommendations	<p>The GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.</p>

GN Review Comment # 04 (GN-RC-04)

References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 1.5 Adaptive Management • Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022)
Concerns	<p>In section 1.5 Adaptive Management, AEM writes "...The TEMMP includes monitoring programs in Sections 4 and 5 to detect potential effects on the terrestrial environment..." (Page 7).</p>

	<p>As written, the TEMMP does not include analyses demonstrating that the monitoring programs have the power to detect potential effects. As indicated in GN-RC-01 above, this has relevance to TC 44 which states:</p> <p>“...Monitoring should be adequate to test impact predictions, monitor impact thresholds and trends over time, and to support implementation of mitigation measures as proposed in the Final Environmental Impact Statement and any subsequent Addenda submitted by the Proponent...”</p> <p>Additionally, in this section, AEM writes “...The TEMMP includes mechanisms for improvement and revision of the plan as necessary, supported by outcomes from the monitoring program described within the plan” (Page 7).</p> <p>However, as written, AEM does not include references to the specific sections describing mechanisms for improvement and revision of the TEMMP.</p>
Recommendations	<p>As indicated in GN-RC-01, the GN recommends AEM include a dedicate section/subsection demonstrating how current monitoring programs are adequate to test impact predictions, monitor impact thresholds and trends over time, and to support implementation of mitigation measures (TC 44), with particular focus on caribou programs.</p> <p>Additionally, the GN recommends that AEM included references to the specific sections describing mechanisms for improvement and revision of the TEMMP.</p>

GN Review Comment # 05 (GN-RC-05)	
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 2.3.3 Caribou Effects Study Area • 230301-11MN034-GN Comments-IT3E.pdf
Concerns	<p>In section 2.3.3 Caribou Effects Study Area, AEM details how the Project’s Caribou Effects Study Area (CESA) was delineated. The GN is concerned that the current CESA uses old data (1998–2011) and uses a method to delineate post-calving range that results in the</p>

	delineation of a much larger area which encompasses almost the entire annual range of the herd. As indicated in GN-R04 from the Meliadine Extension process, the GN believes that the assessment of Project effects on caribou habitat should be based on seasonal ranges (GN, 2023).
Recommendations	The GN recommends that the current CESA (and figure 3) in the TEMMP be removed and substituted with updated caribou seasonal ranges (and maps). This updated CESA should then be used for Project monitoring of items such as range overlap with the Project, direct and indirect loss of habitat.

GN Review Comment # 06 (GN-RC-06)	
References	<ul style="list-style-type: none"> Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 3.1 Caribou Baseline
Concerns	<p>The GN notes that text and figures (when present) in sections 3.1.1. Caribou Population Estimates and 3.1.2 Movement Patterns and Distribution do not utilize the most up to date data available to AEM (for example, the “Estimating Abundance of the Qamanirjuaq Mainland Migratory Barren-Ground Caribou Subpopulation - June 2022,” which was provided to AEM in July 2024).</p> <p>Additionally, in section 3.1.2 Movement Patterns and Distribution, AEM writes “[b]eginning in 2016, caribou collars have also been present in the RSA during other seasons (e.g., calving and post-calving; WSP 2023a).” The GN notes that figures from the 2023 WSP report are not provided in the TEMMP despite their relevance to the ongoing discussion of incorporating calving and post-calving protection measures into the TEMMP.</p>
Recommendations	<p>The GN recommends that, where applicable, AEM update text and figures throughout sections 3.1.1 and 3.1.2 of the TEMMP to reflect the most up to date data available to AEM.</p> <p>Additionally, the GN recommends that AEM include figures from the 2023 WSP report in the TEMMP.</p>

GN Review Comment # 07 (GN-RC-07)

References	<ul style="list-style-type: none">• Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 3.2 Muskox Baseline• Agnico Eagle Mines Limited - Meliadine Division 2022 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2023)• Agnico Eagle Mines Limited - Meliadine Division 2023 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2024)
Concerns	<p>In section 3.2 Muskox Baseline, AEM writes, “Observations in the RSA are limited to one animal in 2008, a group of 26 in 2009, and a group of 18 in 2010 (J. Witteman, Agnico Eagle 2012 pers. comm.; FEIS Volume 9, Golder 2014)” (Page 13).</p> <p>The GN notes that recent annual reports from the Project (e.g., AEM, 2023 and 2022) have included incidental observations and hunting events (i.e., as reported from the Proponent’s Hunter Harvest Study) of muskox in the regional study area (RSA).</p>
Recommendations	<p>The GN recommends that the TEMMP be updated to include the most up-to-date observations of muskox.</p> <p>Additionally, the GN recommends that the TEMMP should be revised to include a figure of all recorded muskox occurrences in the RSA.</p>

GN Review Comment # 08 (GN-RC-08)

References	<ul style="list-style-type: none">• Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.1 Caribou Monitoring Protocol• Sabina Gold & Silver Corp. Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 12) (April 2023)
Concerns	<p>The GN acknowledges that AEM has included a fourth level (i.e., Level 4) for triggering mitigations in Table 5: Level 1 to 4 Caribou Monitoring Protocol Summary found in section 4.1 Caribou Monitoring Protocol of the TEMMP.</p>

However, the GN is concerned that other components of the caribou monitoring protocol and mitigations discussed during past TAG meetings and detailed in a technical memo from March 2024 by three TAG member organizations (GN, Kivalliq Inuit Association (KivIA), and the Sayisi Dene and Northlands Denesuline First Nations (SDFN/NDFN)) have not been included.

Level 5

A fifth level of caribou monitoring to triggering mitigation (i.e., Level 5) is not included in the TEMMP. Level 5 is intended to address scenarios in which calving range overlaps the Project over multiple successive years, facilitating the planned, proactive shutdown of mine operations rather than a reactive approach. The GN supports a proactive, planned approach to operational shutdowns during calving season. This concept is consistent with the Wildlife Mitigation and Monitoring Plan for the Back River Project (Sabina Gold & Silver Corp., 2023).

Collar Monitoring (Daily Rate of Movement)

Daily rate of movement of collar data is not included in the TEMMP. The intention of daily rate of movement was to provide AEM with daily information (in addition to collar data) as a means of identifying the onset and duration of calving as cow movements are reduced during this period.

Height of Land Survey

Changes to Height of Land (HOL) survey frequencies were not included in the TEMMP. For Level 4, it was proposed that HOL surveys be reduced from 3 times a day to daily; Similarly, for Level 5, it was proposed that HOL surveys take place daily. Given the low movement rates of calving caribou relative to other seasons and their sensitivity to disturbance, multiple HOL surveys per day are likely unnecessary for updating distribution information and could act as a source of disturbance.

Caribou Road Surveillance

Changes to road survey frequencies were not included in the TEMMP. For Levels 4 and 5 it was proposed that road surveys be suspended to reduce disturbance. As above, low movement rates of calving caribou relative to other seasons and their sensitivity to disturbance, road surveys would likely be unnecessary for updating distribution information and could act as a source of disturbance.

Calving Ground Overlap with Project

	<p>Monitoring for calving ground overlap with the project (e.g., within a 10 km monitoring zone around the Project site and AWAR) was not included in this section of the TEMMP. However, monitoring this is crucial to Levels 4 and 5. The GN believes the definition for overlap should ultimately be developed with the TAG.</p> <p>Incidental Observations</p> <p>Incidental observations were not included in the TEMMP. Throughout the TEMMP, the desire to work with communities in minimizing impacts on caribou is mentioned. Local land-users are an invaluable source of caribou observations that, both spatially and temporally, provide a greater level of surveillance than periodic height-of-land and road surveys. The GN sees the value of including credible incidental observations that include details of time, location, group size, and composition should be utilized in the TEMMP as a trigger to move from Levels 1-5 of mitigation, without first necessitating verification by AEM employees or contractors (see additional discussion in GN-RC-10 below).</p>
Recommendations	The GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.

GN Review Comment # 09 (GN-RC-09)	
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.2.1 Collar Monitoring (Page 19) • Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022)
Concerns	<p>Section 4.2.1 Collar Monitoring states, “Agnico Eagle supports and contributes to the GN’s caribou satellite-collaring program,” (Page 19). As indicated in GN-RC-01, AEM’s support of the GN’s collaring program has relevance to Project Certificate TCs 44 and 45 with respect to regional-scale monitoring and monitoring to test impact predictions, impact thresholds and trends over time. However, as written, the TEMMP does not provide specific details as to how AEM has supported the GN’s collaring program since the Project began.</p> <p>Section 4.2.1 states that one of the objectives of this collar program is to “[d]etect caribou approaching the Mine site applying the Caribou</p>

	<p>Monitoring Protocol (Section 4.1) which in turn would trigger other monitoring programs...”</p> <p>The GN sees the value of using recent collar location data (see GN-RC-13 below) to not only trigger monitoring programs but also mitigation. The GN maintains that HOL and road surveys do not provide 24/7 surveillance of areas around the Project. Collar location data can be used in tandem with these on-site monitoring activities to improve the detection of caribou near the Project and trigger mitigation in a timely manner.</p>
Recommendations	<p>As indicated in GN-RC-01, the GN recommends Agnico Eagle provide additional information regarding their support of the GN’s caribou satellite-collaring program. The Proponent should detail the past and planned financial and in-kind contributions made to this program since the Project began.</p> <p>Additionally, the GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.</p>

GN Review Comment # 10 (GN-RC-10)	
References	<ul style="list-style-type: none"> Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.2.3 Height of Land Surveys and Caribou Road Surveillance
Concerns	<p>In section 4.2.3, Height of Land Surveys and Caribou Road Surveillance, AEM writes, “when Agnico Eagle receives information (from collar monitoring, KHTO, KivIA or incidental observation reports) suggesting that caribou are moving towards the Mine, then height of land surveys and caribou road surveillance are triggered following the Caribou Monitoring Protocol (Section 4.1)” (Page 20).</p> <p>With respect to both collar location data and incidental observations reports from credible people/organizations (e.g., KivIA, Kangiqliniq Hunters and Trappers Organization (KHTO)), the GN is concerned that these modalities only have the capacity to trigger a HOL survey by AEM as opposed to mitigation (e.g., the movement to Level 2 to 3). As such, the requirement to mobilize a HOL survey has the potential to</p>

	delay implementing time-sensitive mitigation like ceasing drilling or helicopter operations.
Recommendations	The GN recommends that AEM incorporate collar location data and incidental observations reported by the KivIA, KHTO or other credible sources as a direct trigger for mitigation in the TEMMP.

GN Review Comment # 11 (GN-RC-11)	
References	<ul style="list-style-type: none"> Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.2.5 Camera Monitoring
Concerns	<p>In section 4.2.5, Camera Monitoring, one of the stated objectives of the camera monitoring program is to, “measure the effectiveness of mitigation using the frequency and type of traffic and the relationship between vehicles recorded on the road and caribou crossing behaviour at or crossing the road during the different mitigation levels” (Page 22).</p> <p>The GN notes that the design of the camera program may not achieve this objective of measuring mitigation effectiveness. For example, if more caribou are observed crossing during periods of all-weather access road (AWAR) closure, it is unclear how the data from the program can be used to differentiate between the following two explanations: (a) That caribou avoid an open AWAR and are more likely to cross when it is closed; versus (b) the AWAR was closed when caribou were near the road thus more caribou crossings will be detected during these periods regardless of whether caribou are affected by the road/traffic.</p> <p>The GN believes that explanation (a) demonstrates the importance/effectiveness of this mitigation measure while explanation (b) simply indicates that some road closures coincided with caribou being present near the road.</p>
Recommendations	The GN recommends that the TEMMP be revised to clarify how the design of this program can differentiate the two explanations above.

GN Review Comment # 12 (GN-RC-12)**References**

- Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.5.1 Management for Shifts in Caribou Calving Ranges
- Sabina Gold & Silver Corp. Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 12) (April 2023)

Concerns

In 4.5.1 Management for Shifts in Caribou Calving Ranges, AEM states “this section describes management response should the calving range of the Qamanirjuaq herd overlap the mine site” (Page 24).

The GN notes that a technical memo from March 2024 by 3 TAG member organizations proposed that overlap should include a 10 km monitoring zone around the Project site and AWAR.

In 4.5.1.1 Mitigation for calving ground, there are generally no additional mitigation measures for Level 4 relative to Level 3. The GN maintains that daily discussions and communications regarding transportation and the production of a Calving Report are not mitigation activities as these actions do not provide measurable reduction in sensory disturbance of caribou relative to Level 3 mitigation. Overall, Level 4 does not provide increased protection for calving caribou compared to Level 3.

In 4.5.1.2 Mitigation for Long-term Shift of the Core Calving Ground, the response to a shift in calving range to overlap the Project is “additional monitoring will be triggered.” As stated above, the GN does not agree that monitoring is a form mitigation. There are no additional mitigation measures listed in this section relative to Level 3. Despite a scenario in which there is calving ground overlap with the Project on a long-term basis, no additional and proactive measures are proposed. The GN proposes that this scenario warrants a planned operational shutdown of the mine site and AWAR during June 1 to 15 (i.e., Level 5). This concept is consistent with the Wildlife Mitigation and Monitoring Plan for the Back River Project (Sabina Gold & Silver Corp., 2023).

Recommendations

The GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.

GN Review Comment # 13 (GN-RC-13)**References**

- Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.5.2 Caribou Protection System (Pages 25–26)
- Agnico Eagle Mines Limited - Meliadine Division 2023 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2024)
- Severson, J.P., Vosburgh, T.C., & Johnson, H.E. (2023). Effects of vehicle traffic on space use and road crossings of caribou in the Arctic. *Ecological Applications*, 33(8): e2923. <https://doi.org/10.1002/eap.2923>

Concerns

Section 4.5.2 Caribou Protection System includes a list of events that would trigger AEM's various Levels.

However, the GN is concerned that other components discussed during past TAG meetings and detailed in a technical memo from March 2024 by three TAG member organizations have not been included. Specifically, AEM's proposed triggers do not include the use of collar locations as triggers, use of demographic information or the inclusion of a Level 5.

The TEMMP does not include the use of collar location data as a trigger for mitigation. The GN sees the value of using collar location data to help ensure no missed detections of caribou occur between HOL or road surveys. The GN recognizes AEM's concerns regarding the use of collar locations to trigger mitigation if the last known location is several days old. As such, the GN has proposed using collar locations as triggers for locations less than 24 hour old for Levels 1-3.

However, for Level 4, the GN has proposed using collar location data no more than 72 hours old. This approach is intended to reflect the reduced movement rates and increased fidelity of calving caribou.

The TEMMP does not include using demographic information (i.e., the presence of cows or newborn calves) to trigger Level 4. Evidence suggests that Zones-of-Influence around mine sites can be at least 10 km (e.g., Severson et al. 2023). Additionally, HOL surveys can see groups of caribou beyond 5 km with some observations in 2023 at 8 km (AEM, 2024).

Recommendations	The GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.
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GN Review Comment # 14 (GN-RC-14)	
References	<ul style="list-style-type: none"> Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.5.2.3 Level 3 Caribou Protection: Work Suspension Protocol; 4.5.2.4 Level 4 Caribou Protection: Work Suspension Protocol
Concerns	<p>In Section 4.5.2.3, Level 3 Caribou Protection: Work Suspension Protocol, AEM writes:</p> <p>“All employees at the drill sites that are in the direction of the caribou migration and within a 5 km radius of the migration will be notified that they will need to shut down the operations such that the drills and associated helicopter flights can cease as quickly as possible, before caribou are within 5 km” (Page 27).</p> <p>The GN notes that this statement is seemingly contradictory. If employees are within a 5 km radius of a migration, operations should have already ceased.</p> <p>Furthermore, the GN is concerned that remote activities (drilling and associated helicopter flights) may require more time to shutdown than mine site operations. As such, these operations should be suspended when Level 2 is triggered to minimize exposure of caribou to sensory disturbance.</p> <p>In section 4.5.2.3, AEM states, “...during essential helicopter transport of personnel back to camp, the Air Traffic Management Plan will be applied to avoid disturbing the caribou herd (avoidance distance of 1,000 m vertical and 1,500 m horizontal)” (Page 27).</p> <p>The GN believes this statement refers to personnel who are at a location at which it is too far or impossible to walk back to the mine site. Under the GN’s above recommendation to suspend remote drilling operations at Level 2, these helicopter transports would not be required under Level 3.</p>

	<p>Additionally in section 4.5.2.3, AEM writes, "...minimize outside workforce when caribou herds (i.e., >50 animals) move through the Mine," (Page 27). The GN finds this statement to be ambiguous.</p> <p>In Section 4.5.2.4 Level 4 Caribou Protection: Work Suspension Protocol, AEM writes, "...upon TAG guidance, AEM will be conducting [a] pilot project to assess feasibility of additional monitoring occurring in this period (5-8-10 km HOL)" (Page 28).</p> <p>Information from the Project's annual reports indicate that HOL can detect some approaching caribou within 5-10 km of the Project. As such, the necessity of this pilot program is unclear. The GN recognizes that the detection probability at this range will be less than at 0-5 km. However, the GN still sees the inherent value of implementing mitigation measures for groups that are observed at the 5-10 km range.</p> <p>The GN also notes that other forms of monitoring, current or future (e.g., incidental, drones, geo-fencing), may enhance the ability to detect caribou up to a range of 10 km from the Project.</p>
Recommendations	<p>The GN recommends that AEM clarify the two phrases indicated above in the TEMMP.</p> <p>The GN recommends that AEM include drilling as a restricted activity for Level 2 in the TEMMP.</p> <p>Additionally, the GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.</p>

GN Review Comment # 15 (GN-RC-15)	
References	<ul style="list-style-type: none"> Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – Table 7: Level 1 to 3 Caribou Protection System Summary of Mitigation
Concerns	<p>The GN is concerned that components discussed during past TAG meetings and detailed in a technical memo from March 2024 by three TAG member organizations have not been included in Table 7: Level 1 to 3 Caribou Protection System of Summary of mitigation.</p>

	<p>The GN acknowledges that AEM has included Level 4 in Table 7. However, the GN notes that there is no difference, in terms of mitigation activities to reduce sensory disturbance, between Levels 3 and 4. In other words, calving caribou are afforded no extra protection under this system.</p> <p>The GN believes that daily discussions and communications regarding transportation are not mitigation activities as these actions provide no measurable reduction in sensory disturbance of caribou, relative to Level 3 mitigation. Level 4 must include measurable reductions in surface traffic and equipment operation at both the mine site and on the AWAR, relative to Level 3 mitigation. This measured reduction should be demonstrated in the TEMMP and documented in annual reports.</p> <p>Additionally, the GN notes that Table 7 uses the terms “essential traffic” and “emergency situations.” However, these terms are not defined in this section of the TEMMP.</p>
Recommendations	<p>The GN recommends that Level 4 includes measurable reductions in surface traffic and equipment operation at both the mine site and on the AWAR, relative to Level 3 mitigation. The GN recommends that this measured reduction be demonstrated in the TEMMP and documented in annual reports.</p> <p>Additionally, the GN recommends that a Level 5 be added for planned operational shutdown that is triggered when data show that the long-term distribution of calving overlaps the Project per section 4.5.1.2.</p> <p>The GN recommends that AEM revise the TEMMP to define the terms “essential traffic” and “emergency situations,” in this section.</p> <p>The GN recommends that AEM revise the TEMMP to incorporate the changes to this section, as described above and illustrated in the accompanying track changes version of the TEMMP.</p>

GN Review Comment # 16 (GN-RC-16)

References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May
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	2024) – 4.5.2.5 Permitted Activities during Work Suspension Protocol
Concerns	<p>Section 4.5.2.5 Permitted Activities during Work Suspension Protocol provides a list for light duty, or essential activities permitted to occur during various level shutdowns. However, the GN notes that definitions for essential and light duty are not provided.</p> <p>Additionally, the following are listed as light duty/essential activities: “Feeding the Buggy Bin with double-high seacan walls in place; Using a temporary tailings storage pad immediately outside of the Church with double-high seacan walls in place; Haulage to the Automation Pad at Portals with double-high seacan walls in place” (Page 32).</p> <p>However, the GN notes that AEM does not provide justification within the TEMMP for why these activities are considered either essential activities or light duties.</p>
Recommendations	<p>The GN recommends that AEM revise the TEMMP to provide definitions for light duty and essential activities.</p> <p>Additionally, the GN recommends that AEM provide justification within the TEMMP for the above-listed activities.</p>

GN Review Comment # 17 (GN-RC-17)	
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.5.3.1 Road Traffic Protocol • Agnico Eagle Mines Limited: Meadowbank Division. Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7. (June 2019) • Agnico Eagle Mines Limited: Meliadine Division, Appendix 25 – 2023 Terrestrial Environment Management and Monitoring Plan Annual Report (March 2024) • Severson, J.P., Vosburgh, T.C., & Johnson, H.E. (2023). Effects of vehicle traffic on space use and road crossings of caribou in the Arctic. Ecological Applications, 33(8): e2923. https://doi.org/10.1002/eap.2923

	<ul style="list-style-type: none"> Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022)
Concerns	<p>In section 4.5.3.1, Road Traffic Protocol, AEM states that the mitigation distance for a group of 50 or more caribou, or 10 or more muskox is 100 m from the AWAR. The GN is concerned about the justification for this mitigation distance threshold. Published literature on road effects on caribou and results from the Project's behaviour monitoring program indicated that this migration distance threshold is too short. For example, recent studies of barren-ground caribou suggest caribou respond to road traffic at a range of at least 1-3 km (e.g., Severson et al. 2023). Additionally, behavioral studies at the Meliadine AWAR indicate that caribou respond to traffic at a range of at least 300 m (AEM, 2024).</p> <p>The GN notes that AEM's Meadowbank-Whale Tail project has a mitigation distance threshold of 1.5 km (AEM, 2019).</p> <p>Finally, the GN notes that the Project's TC 48 requires closure of the AWAR to public access when >50 caribou are detected within 1 km of the road.</p>
Recommendations	The GN recommends that the TEMMP be revised so that the AWAR mitigation distance is increased to 1.5 km.

GN Review Comment # 18 (GN-RC-18)	
References	<ul style="list-style-type: none"> Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 4.5.3.6 Underground Mining Protocol
Concerns	<p>Section 4.5.3.6 Underground Mining Protocol states</p> <p>“Underground mining activities can continue during all levels of caribou protection. Underground staff are required to abide by the following guidelines when conducting operations at the Meliadine Mine: Visual barriers (sea cans) placed around portal entries and surface travel paths to the processing plant; and Twice [sic] daily vehicle convoys are used for shift change, led by Environmental staff (or appropriate delegates), following a path behind visual barriers from the animals.”</p>

	The GN notes that evidence of the effectiveness of these measures is not present or referenced in the TEMMP, and is necessary to justify AEM's continuation of these activities during all levels of caribou protection.
Recommendations	The GN requests that AEM present or reference materials demonstrating the effectiveness of the measures described above, in the TEMMP.

GN Review Comment # 19 (GN-RC-19)	
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – Table 8: Summary of Predicted Effects, Monitoring Methods, and Mitigations for Caribou and Muskox (Page 37) • Nunavut Impact Review Board. Exhibit 21 – Waterline FEIS Addendum List of Commitments as of June 17, 2021 Saline Effluent Discharge to Marine Environment (June 2021). • Agnico Eagle: Meliadine Gold Mine, Appendix 32 – 2023 TAG Annual Report (March 2024) • Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022)
Concerns	<p>Table 8: Summary of Predicted Effects, Monitoring Methods, and Mitigations for Caribou and Muskox includes the text “[c]aribou avoiding the site <10% caribou deflection from AWAR,” (Page 37). The GN notes that the TEMMP does not include a definition of “deflection.” Clarity regarding this definition is crucial as it has been a topic of considerable discussion during TAG meetings and recent Nunavut Impact Review Board (NIRB) hearings for the Project’s Final Environmental Impact Statement (FEIS) amendments. For example, AEM committed to developing a definition of deflection for caribou during the NIRB’s review of the Saline Effluent Discharge to the Marine Environment Proposal (NIRB, 2021).</p> <p>Evaluating the effectiveness of mitigation is the first purpose of the TEMMP, as stated in section 1.4.2 of this document: “Provide information to test the predicted wildlife-related effects of the Project (as specified in the 2014 FEIS, and Amendments 1 & 2) and estimate the effectiveness of existing environmental design and mitigation measures (e.g. if monitoring demonstrates that impacts are within</p>

	<p>predictions or established thresholds, existing mitigation is considered effective)” (Page 6).</p> <p>However, Table 8 in the TEMMP does not address the topic of what is adequate to test impact predictions and monitoring impact threshold despite being a requirement of TC 44. Specifically, with reference to caribou sensory disturbance more information is needed to demonstrate that these monitoring programs have the power to detect impacts and exceedance of thresholds.</p> <p>For example, information should be provided as to what level of collaring sampling effort is needed to detect deflections of caribou >10%. The GN notes that recent analyses of collar data conducted by AEM, to support commitment 38 of the NIRB’s review of the Saline Effluent Discharge to the Marine Environment proposal, encountered sample size issues which constrained the analyses that could be conducted (AEM, 2024).</p>
Recommendations	<p>The GN recommends that AEM revise the TEMMP to include a definition of deflection.</p> <p>Additionally, the GN recommends that AEM revise the TEMMP to include details of how mitigation effectiveness is or will be evaluated. This would include information such as study designs, sampling effort needed, frequency of analyses.</p>

GN Review Comment # 20 (GN-RC-20)	
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 5.6.3 Invasive Species (Page 50 –51). • Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022).
Concerns	<p>Section 5.6.3 Invasive Species does not define invasive or non-native species or reflect requirements of Section 91 (ss 2) of the <i>Wildlife Act</i> which states:</p> <p>“(2) No person shall release a member of a species into a habitat in which that species does not belong or never naturally occurred.</p>

	<p>(3) Any person who contravenes subsection (1) or (2) shall make every effort to recover the animal or member of the species.”</p> <p>In section 5.6.3 AEM writes, “[a]ny non-native and invasive plant species are identified in the Mine area will be reported to the GN, as per guidelines.” (Page 50). The GN notes this statement does not reference specific guidelines. Additionally, the GN notes that this section does not reference TC 37 which states “...[a]ny introduction of non-indigenous plant species must be promptly report to the Government of Nunavut Department of Environment.”.</p> <p>The GN notes section 5.6.3 discusses preventative actions and monitoring of invasive or non-native species, but not mitigation.</p>
Recommendations	<p>The GN recommends that AEM include definitions for invasive and non-native species in the context of applicable federal and/or territorial statutes in the TEMMP.</p> <p>The GN recommends that AEM include reference to section 91 of Nunavut’s <i>Wildlife Act</i> in this section of the TEMMP.</p> <p>The GN recommends that a reference to TC 37 be included in this section of the TEMMP.</p> <p>The GN recommends that a basic mitigation plan should be included in the TEMMP to describe actions taken to remove or control these species.</p>

GN Review Comment # 21 (GN-RC-21)	
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – Table 13: Summary of Predicted Effects, Monitoring Methods, and Mitigations for Furbearers. • Agnico Eagle Meliadine Division – Terrestrial Environment Management and Monitoring Plan. Version 3. (June 2020).
Concerns	<p>Table 13: Summary of Predicted Effects, Monitoring Methods, and Mitigations for Furbearers states that the project-related mortality for arctic fox is 20 arctic fox per year but that this value “exclude[s] animals trapped under GN guidance” (Page 54).</p>

	The GN notes that this value is substantially different previous TEMMPs (e.g., AEM, 2020).
Recommendations	The GN request that the TEMMP be revised to provide a justification for the increase in this number.

GN Review Comment # 22 (GN-RC-22)

References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 6.1.3 Road Traffic Management. • Nunavut Impact Review Board, Project Certificate No. 006, Amendment No. 002 (March 2022).
Concerns	<p>Section 6.1.3 Road Traffic Management says, “during periods when herds of caribou (50 or more individuals) are within 100 m of the AWAR, the southern gate will be closed to traffic” (Page 61).</p> <p>The GN notes that this statement seems to conflict with TC 48 which states:</p> <p>“...During periods when large aggregations of caribou (greater than 50 individuals) are detected <u>within 1 km</u> of the all-weather access road (AWAR), the road will be closed to public access via car and truck by means of a barrier at the southern gate. Public access using all-terrain vehicles (ATVs) will be allowed....”</p> <p>and,</p> <p>“...During periods when large aggregations of caribou (greater than 50 individuals) are observed <u>within 1 km</u> of the AWAR, the road will be closed to public access via barriers at bridges on the AWAR to prevent all vehicle access, including ATVs. This will allow ATVs to enter areas previously accessible along existing trails while not facilitating access via bridges constructed specifically for the Project...”</p>
Recommendations	The GN recommends that this section of the TEMMP be revised to be consistent with TC 48.

GN Review Comment # 23 (GN-RC-23)

References	<ul style="list-style-type: none"> Agnico Eagle Mines Limited - Meliadine Division Terrestrial Environment Management and Monitoring Plan, Version 5.1 (May 2024) – 6.1.7 Deterring Wildlife
Concerns	<p>Section 6.1.7 Deterring Wildlife AEM writes, “in the event that caribou with calves are spotted on site, Agnico Eagle will confer with KivIA, GN, KHTO, and community elders and assess installing deterrents on site” (Page 67).</p> <p>The GN does not support deterring caribou accompanied by calves unless necessary for the safety of the caribou themselves. Deterrence of caribou to facilitate on-going mine operations is not justifiable and may constitute harassment of wildlife under the territorial <i>Wildlife Act</i>.</p>
Recommendations	<p>The GN recommends that this phrase be removed from or substantially clarified in the TEMMP.</p>

Answers to TEMMP v5 Comments

December 6th 2024 — Winnipeg, MB
Meliadine TAG Meeting



TEMMP V5 COMMENTS - KIVIA

Comments Number	Topic	Request	Proposed Answer for KivIA
KivIA -1	Daily Rate of Movement	Using the daily rate of movement of collared caribou during pre-calving and calving period of the herd to trigger mitigation.	<p>When GN provides the calculated daily movement rate of movement, AEM commits to use of the daily rates of movement of collared caribou during the pre-calving and calving period of the herd.</p> <p>At this time, the daily rate of movement is not provided to AEM and the collaring information provided by the GN does not allow calculating the daily rates of movement</p> <p>The collaring maps are provided to AEM in a pdf format and while they are provided on a daily basis, the collaring information they illustrate can be up to two days old.</p> <p>Following the TAG's recommendation, and until GIS exploitable daily data is provided or the daily rate of movement is provided, AEM has committed to providing a yearly map of the annual location of the calving range.</p>
KivIA -2	10km triggers	Level 4 triggered (during calving season) when calving grounds or caribou overlap within a 10 km radius of the site.	<p>AEM agrees to monitor collaring maps for caribou presence within the 10km radius of the mine site during the calving period (June 1 to June 15) and should collared caribou be present in the 10 km radius during that time, AEM will:</p> <ul style="list-style-type: none"> -notify KivIA that collared caribou have entered the 10 km radius; -increase its monitoring efforts to 4 times daily; -lower the basins as much as possible to minimize the number of pumps operating during level 4 and limit the traffic on the site. <p>Following the TAG's guidance, AEM did two extended Distance Monitoring Trial with the collaboration of KivIA.</p> <p>Results of these trials, conducted in different seasons and in different weather conditions indicate that visual monitoring method are not reliable at a 10km distance.</p>
KivIA -3	300m AWAR closure Trigger	Change the 100m AWAR closure trigger for 300m based on the behavioral monitoring report	AEM agrees to use 300m for AWAR closure trigger.
KivIA -4	20 % activity reduction during level 4	Measure a reduction of 20% of activities between level 3 and level 4	<p>Levels 3 and 4 are effective in reducing mine related activities and are protective of caribou from a visual and auditory perspective.</p> <p>During level 4, a daily transportation plan is discussed and agreed upon with KivIA. Internal transportation routes used during Level 4 will be elaborated to minimize potential visual contact with the animals, taking advantage of the site's visual barriers.</p>

TEMMP V5 COMMENTS - GN

Comments Number	Topic	Request	Proposed Answer for KivIA
GN -1	TC44, 45, 180	<p>The GN recommends that the TEMMP be edited to:</p> <ul style="list-style-type: none">- include a dedicated section/subsection demonstrating how the Proponent has increased caribou monitoring across the regional study area and contributed to existing and planned regional monitoring initiatives (TC 44 and TC 45) detailing the past and planned financial and in-kind contributions to existing and planned regional monitoring initiatives.- include a dedicate section/subsection demonstrating how the levels of monitoring are adequate to test impact predictions, monitor impact thresholds and trends over time, and to support implementation of mitigation measures (TC 44).- describe methods for undertaking weekly winter track surveys (TC 118). <p>Additionally, the GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.</p>	<p>The Meliadine Annual Report TC concordance table demonstrates compliance with TC 44, 45 and 118.</p> <p>Tracks observations are already part of the wildlife survey describe in section 5.1.1.As per GN recommendations, TEMMP wording will be modified to clarify that that these surveys take place throughout the year.</p>
GN -2	Caribou satellite-collaring program support	<p>The GN recommends Agnico Eagle provide additional information regarding their support of the GN’s caribou satellite-collaring program.</p> <p>The Proponent should detail the past and planned financial and in-kind contributions made to this program since the Project began.</p> <p>Additionally, the GN recommends specific revisions to the text of this section as indicated in the accompanying track changes version of the TEMMP.</p>	<p>Refer to Agnico Eagle’s response to GN-06 of the 2023 Annual Report Comments.</p>
GN -3	Incoporate TAG Advice in TEMMP	<p>As written, section 1.2.4 Terrestrial Advisory Group, suggests that TAG’s advice or input are incorporated into the TEMMP. However, TAG’s Terms of Reference (TOR) states, “Agnico Eagle will consider implementation of any advice made by a majority of all Parties of the TAG (TAG Advice)” (AEM, 2023). As such, AEM is not required to incorporate TAG advice in TEMMP revisions even if a majority of its members are in favor of such.</p>	<p>The TEMMP wording has been revised accordingly.</p>
GN -4	TC44	<p>As indicated in GN-RC-01, the GN recommends AEM include a dedicate section/subsection demonstrating how current monitoring programs are adequate to test impact predictions, monitor impact thresholds and trends over time, and to support implementation of mitigation measures (TC 44), with particular focus on caribou programs.</p>	<p>See GN-1</p>
GN -5	CESA	<p>The GN recommends that the current CESA (and figure 3) in the TEMMP be removed and substituted with updated caribou seasonal ranges (and maps). This updated CESA should then be used for Project monitoring of items such as range overlap with the Project, direct and indirect loss of habitat.</p>	<p>The CESA was used in the FEIS and is presented in the TEMMP for ease of comparison. Other TEMMP maps have been updated with the most current data available.</p>
GN -6	2022 Abundance Study	<p>The GN recommends that, where applicable, AEM update text and figures throughout sections 3.1.1 and 3.1.2 of the TEMMP to reflect the most up to date data available to AEM.</p> <p>Additionally, the GN recommends that AEM include figures from the 2023 WSP report in the TEMMP.</p>	<p>At the moment the TEMMP draft was shared with TAG parties (May 30), the study GN is referring to wasn’t available to AEM. This section will be updated with most current data available.</p> <p>Regarding Calving Range map made by WSP, AEM committed to develop this map yearly and will include it in the TEMMP annual report.</p>

TEMMP V5 COMMENTS - GN



Comments Number	Topic	Request	Proposed Answer for KivIA
GN -6	2022 Abundance Study	<p>The GN recommends that, where applicable, AEM update text and figures throughout sections 3.1.1 and 3.1.2 of the TEMMP to reflect the most up to date data available to AEM.</p> <p>Additionally, the GN recommends that AEM include figures from the 2023 WSP report in the TEMMP.</p>	<p>At the moment the TEMMP draft was shared with TAG parties (May 30), the study GN is referring to wasn't available to AEM. This section will be updated with most current data available.</p> <p>Regarding Calving Range map made by WSP, AEM committed to develop this map yearly and will include it in the TEMMP annual report.</p>
GN -7	Muskox information	<p>The GN recommends that the TEMMP be updated to include the most up-to-date observations of muskox.</p> <p>Additionally, the GN recommends that the TEMMP should be revised to include a figure of all recorded muskox occurrences in the RSA.</p>	<p>During the January 2024 TAG meeting, TAG requested the GN to provide information on muskox harvest data, past studies beyond what's already cited in the Meliadine TEMMP, and any planned work. This action item is still pending.</p> <p>AEM will be pleased to update this information when it is provided by the GN.</p>
GN -8	Level 5	<p>Level 5 is intended to address scenarios in which calving range overlaps the Project over multiple successive years, facilitating the planned, proactive shutdown of mine operations rather than a reactive approach.</p>	<p>Levels 3 and 4 are effective in reducing mine related activities and are protective of caribou from a visual and auditory perspective.</p> <p>During level 4, a daily transportation plan is discussed and agreed upon with KivIA. Internal transportation routes used during Level 4 will be elaborated to minimize potential visual contact with the animals, taking advantage of the site's visual barriers.</p>
GN -8	Daily Rate of Movement	<p>The intention of daily rate of movement was to provide AEM with daily information (in addition to collar data) as a means of identifying the onset and duration of calving as cow movements are reduced during this period.</p>	<p>See answer to KivIA-1</p>
GN -8	Reduction Monitoring	<p>Reduction of monitoring (HOL survey, Behaviour survey) during levels 4 and 5.</p>	<p>See answer to KivIA-2</p>
GN -8	Collars map information as trigger	<p>Using location of collars on map to trigger mitigation.</p>	<p>See answer to KivIA-2</p>

TEMMP V5 COMMENTS - GN

Comments Number	Topic	Request	Proposed Answer for KivIA
GN -9	Caribou satellite-collaring program support	the GN recommends Agnico Eagle provide additional information regarding their support of the GN's caribou satellite-collaring program. The Proponent should detail the past and planned financial and in-kind contributions made to this program since the Project began.	Refer to Agnico Eagle's response to GN-06 of the 2023 Annual Report Comments.
GN -10	Caribou Mitigation	The GN recommends that AEM incorporate collar location data and incidental observations reported by the KivIA, KHTO or other credible sources as a direct trigger for mitigation in the TEMMP.	Agnico Eagle will use collar location data to trigger levels 1 and 2. Incidental observations, from KivIA, KHTO or other credible sources, will also be added as triggers.
GN -11	Camera study	The GN recommends that the TEMMP be revised to clarify how the design of the camera program can differentiate the two explanations below: (a) demonstrates the importance/effectiveness of this mitigation measure while explanation (b) simply indicates that some road closures coincided with caribou being present near the road.	This comment will be addressed within the trail camera study report.
GN -12	Planned Shutdown	Level 5 is intended to address scenarios in which calving range overlaps the Project over multiple successive years, facilitating the planned, proactive shutdown of mine operations rather than a reactive approach.	Levels 3 and 4 are effective in reducing mine related activities and are protective of caribou from a visual and auditory perspective. During level 4, a daily transportation plan is discussed and agreed upon with KivIA. Internal transportation routes used during Level 4 will be elaborated to minimize potential visual contact with the animals, taking advantage of the site's visual barriers.
GN -12	Level 4 Increase in protection	In 4.5.1.1 Mitigation for calving ground, there are generally no additional mitigation measures for Level 4 relative to Level 3. The GN maintains that daily discussions and communications regarding transportation and the production of a Calving Report are not mitigation activities as these actions do not provide measurable reduction in sensory disturbance of caribou relative to Level 3 mitigation. Overall, Level 4 does not provide increased protection for calving caribou compared to Level 3.	Levels 3 and 4 are effective in reducing mine related activities and are protective of caribou from a visual and auditory perspective. During level 4, a daily transportation plan is discussed and agreed upon with KivIA. Internal transportation routes used during Level 4 will be elaborated to minimize potential visual contact with the animals, taking advantage of the site's visual barriers.
GN -13	Collars map information as trigger	Using location of collars on map to trigger mitigation.	See answer to KivIA-2
GN -13	Using Demographic information as Trigger Level	The TEMMP does not include using demographic information (i.e., the presence of cows or newborn calves) to trigger Level 4. Evidence suggests that Zones-of-Influence around mine sites can be at least 10 km (e.g., Severson et al. 2023). Additionally, HOL surveys can see groups of caribou beyond 5 km with some observations in 2023 at 8 km (AEM, 2024).	See answer to KivIA-2. Agnico Eagle believes that not discriminating the trigger based on demographic information is more protective of the caribou.

TEMMP V5 COMMENTS - GN

Comments Number	Topic	Request	Proposed Answer for KivIA
GN -14	Drilling operation and Helicopter flight	Drilling activities and helicopter flight should be suspended in Level 2.	Drilling activities and helicopter flights are suspended during levels 3 and 4.
GN -15	Table 7 addition	Light duty activities mitigation for level 3 and level 4 should also include:"Measurable and reported reduction relative to typical level 3 activity" and minimized crew change.	<p>Levels 3 and 4 are effective in reducing mine related activities and are protective of caribou from a visual and auditory perspective.</p> <p>During level 4, a daily transportation plan is discussed and agreed upon with KivIA. Internal transportation routes used during Level 4 will be elaborated to minimize potential visual contact with the animals, taking advantage of the site's visual barriers.</p>
GN -16	Light duty activities definition	The GN recommends that AEM revise the TEMMP to provide definitions for light duty and essential activities.	Light duty and essential activities are defined in section 4.5.2.5
GN -17	AWAR closure Trigger	The GN recommends that the TEMMP be revised so that the AWAR mitigation distance is increased to 1.5 km.	See answer to KivIA-3
GN -18	Underground activities during Level 3	The GN requests that AEM present or reference materials demonstrating the effectiveness of the underground activities mitigation measure, in the TEMMP.	<p>The effectiveness of underground mitigation measures has been demonstrated on several occasions and these studies have been made available to TAG members.</p> <p>The noise monitoring study shows that no difference was observed at level 3 with or without underground activities.</p> <p>As described above, the road used for convoys related to underground activities is hidden from the outside view due to the mine infrastructure.</p>
GN -19	Deflection Definition	The GN recommends that AEM revise the TEMMP to include a definition of deflection.	Deflection was defined in the C38 report and AEM will clarify the TEMMP wording to reflect that definition.
GN -20	Invasive Species section	<p>The GN recommends that AEM include reference to section 91 of Nunavut's Wildlife Act in this section of the TEMMP.</p> <p>The GN recommends that a reference to TC 37 be included in this section of the TEMMP.</p>	AEM will modify the text accordingly.

TEMMP V5 COMMENTS - GN

Comments Number	Topic	Request	Proposed Answer for KivIA
GN -21	Project-related mortality for arctic fox	The GN request that the TEMMP be revised to provide a justification for the increase in the number of Project-related mortality for arctic fox (20 forx/year)	<p>As per the Arctic fox mortality threshold change, it was made between the TEMMP V3 (June 2020) and TEMMP V4 (April 2022) versions, prior to the TAG being established.</p> <p>The current approved TEMMP V4 was submitted with the Meliadine 2021 Annual Report and was distributed to Parties as per the usual review process. No comments were received from Parties on this change, which accounts for the fact the FEIS didn't consider situations in which Agnico Eagle would be instructed to trap foxes on site by the GN. The number was based on the emerging trends at that time while still being protective of the fox population.</p> <p>Upon November 26th, 2024 discussions with the GN, it's AEM's understanding that the GN supports removing the mortality of foxes trapped under GN guidance from this number and will revise the threshold number accordingly.</p>
GN -22	AWAR closure Trigger	The GN recommends that this section of the TEMMP be revised to be consistent with TC 48 which states: "...During periods when large aggregations of caribou (greater than 50 individuals) are detected within 1 km of the all-weather access road (AWAR), the road will be closed to public access via car and truck by means of a barrier at the southern gate. Public access using all-terrain vehicles (ATVs) will be allowed.."	Wording will be adjusted to ensure consistency with the project certificate.
GN -23	Deterring Caribou	<p>Section 6.1.7 Deterring Wildlife AEM writes, "in the event that caribou with calves are spotted on site, Agnico Eagle will confer with KivIA, GN, KHTO, and community elders and assess installing deterrents on site" (Page 67).</p> <p>The GN does not support deterring caribou accompanied by calves unless necessary for the safety of the caribou themselves. Deterrence of caribou to facilitate on-going mine operations is not justifiable and may constitute harassment of wildlife under the territorial Wildlife Act. The GN recommends that this phrase be removed from or substantially clarified in the TEMMP.</p>	<p>As indicated in the TEMMP, this decision will be taken in consultation with KivIA, GN and KHTO. If such a decision is made, Agnico Eagle will use passive deterrents to prevent caribou from entering infrastructures that could harm them. This statement was added following discussion with the KivIA to prevent caribou from being harmed on site.</p>

TEMMP V5 COMMENTS – SDFN/NDFN

Comments Number	Topic	Request	Proposed Answer for KivIA
SDFN/NDFN-2	Behaviour Monitoring	Section 4.2.4 Behaviour Monitoring: a. The objectives for this section should be clarified into 3 bullets. i. Determine if caribou activity budgets change with distance from the Mine ii. Document caribou responses to stressors which includes physical disturbances, sensory disturbance (sight, hearing, smell, touch, taste), weather and insects. [Caribou respond to sensory disturbance with all their senses. Sensory disturbance should be defined as indicated. Weather conditions and levels of insect harassment should be monitored in conjunction with caribou responses to physical disturbances] iii. Determine if caribou distribution changes with proximity to the Mine.	AEM believes the behaviour study objectives are adequately worded as are.
SDFN/NDFN-3	Reduce caribou number trigger	Reduce the trigger of 50 caribou for 25 caribou for the site and the AWAR	Agnico Eagle has demonstrated the current triggers are effective in activating mitigations and are protective of caribou and will maintain the current caribou number triggers.
SDFN/NDFN-4	300m AWAR closure Trigger	Change the 100m AWAR closure trigger for 300m based on the behavioral monitoring report	See answer to KivIA-3
SDFN/NDFN-5	10km triggers	Level 4 triggered (during calving season) when calving grounds or caribou overlap within a 10 km radius of the site.	See answer to KivIA-2
SDFN/NDFN-6	Level 5	Level 5 is intended to address scenarios in which calving range overlaps the Project over multiple successive years, facilitating the planned, proactive shutdown of mine operations rather than a reactive approach.	See answer to GN-2
SDFN/NDFN-7	Deterring Caribou	In Section 6.1.7 'Deterring Wildlife', the first statement at the top of page 66 should be re-worded to state; "In the event that caribou with calves are spotted on site or adjacent to AWAR/Discovery Road waterline construction, Agnico Eagle will confer with KivIA, GN, KHTO and community elders and assess installing additional deterrents on site or during waterline construction.	Agnico Eagle agrees to reword this statement to include AWAR. Regarding the waterline, as agreed in the 2023 Annual Report commentary, the next version of the spill contingency plan will include the implementation of deterrent in the case of a waterline spill to prevent wildlife from entering the area.



Thank you!

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