



## 2. Review of Project Certificate Compliance

TC #	Terms and Conditions Project Certificate 006 Amendment 2	Compliance with Project Certificate (Yes/No/In Progress)	Additional Comments
2	The Proponent shall demonstrate through monitoring of air quality at the aboveground emissions points at the mine site and at the Tiriganiaq site that sulphur dioxide (SO2) and nitrous dioxide (NO2) emissions remain within predicted levels and, where applicable, within limits established by all applicable guidelines and regulations. In cases where exceedances occur, the Proponent shall provide an explanation for the exceedance, a description of planned mitigation, and shall conduct additional monitoring to evaluate the effectiveness of mitigative measures.	In Progress	The measured air quality parameters (NO2, SO2, dust fall) did not exceed regulatory guidelines, except for the dust fall at station DF-4, which is down wind of the mine site and very close to Tiri OP-1. Increased site activity appears to be the reason for this. The KivIA requests that the Proponent review its operational procedures, such as speed limits and the use of water and/or calcium chloride to better control dust, especially during periods of above average wind speed.
6	The Proponent shall employ appropriate dust suppression measures when conducting activities in the landfill such as topping or capping.	Yes	Compaction of landfill material plus progressive capping with waste rock is being used to control dust and windblown debris. Ten (10) of thirteen (13) soil samples from the Waste Farm A soil windrows remediation failed GN's industrial soil remediation criteria. On-going remediation of the Waste Farm A soil windrows will continue during 2025 to resolve this issue.
10	The Proponent shall further develop and implement its noise abatement plan to protect people and wildlife from mine activity noise, including, blasting, drilling, equipment, vehicles and aircraft. The noise abatement plan will be developed in consultation the Government of Nunavut, Environment Canada and Health Canada as appropriate, and at a minimum is to include: a. Restrictions on blasting and drilling when migrating caribou, birds or local carnivores may be affected; b. The establishment of strict standards for noise levels; use of equipment and vehicles with the best noise attenuation devices; c. When practical, the use of fences or berms around noisy machinery or sites;	In Progress	<p>(i) Progress on implementing TC10 in 2024 was apparent as Agnico Eagle further responded to TAG questions on the 2023 noise study (Appendix 38). The study had measured how noise levels were reduced during Level 3 mitigation including the use of stacked sea cans at the mine site to attenuate noise disturbance to caribou. The March 2024 presentation to TAG showed how switching from Full Operations to Level 3 reduced the spatial extent of areas within 5km of the mine site where caribou may hear noise from Meliadine operations relative to differing wind strengths.</p> <p>(ii) Agnico Eagle has a blasting protocol to reduce any risks of blasting to caribou (Appendix 29-17; Section 4.5.3.4) and monitors the blasting noise (Appendices 22 and 23). The 2024 Annual report describes that blasting monitoring of Peak particle velocity (PPV) and overpressure did not exceed the guidelines relevant for fish (Annual Report; Sections 7.6 and 7.7; Appendix 22). The Annual Report (Appendix 26) did not cross reference exposure of caribou to blasting in 2024. However, Agnico Eagle through a consultant's report (30 April 2025) provided to TAG did compare dates of surface blasting,</p>

			<p>propane noise cannon use, with caribou occurrence around the Meliadine Mine (the Mine) in 2024. Caribou occurrence was based on collared caribou locations. Propane noise cannons were used every 30 minutes to deter birds from nesting although the location is not specified. However, Appendix 26 (Section 10.0) specifies that propane cannons were used at Tiri-1, H14, CP5, Channel 5, and the northwestern corner of CP1 and removed during migration. The consultant's April 30 report states that the cannons were only used during Level 0 Caribou Migration Protocol in 2024. Level 0 is no caribou occurrence but this is unclear as caribou occurrence was recorded during the period 6 - 28 May (Appendix J) in the vicinity of the mine site (the Tailings storage facility, waste rock storage facility<sup>1</sup>, for example. The KivIA has concerns about the lack of clarity in the reporting as to whether caribou were exposed to blasting and the propane cannons during late pre-calving migration (Appendix J).</p> <p><b>Recommendation:</b> The KivIA requests that Agnico Eagle clarify whether caribou were exposed to blasting and the propane cannons during pre-calving migration in 2024. Additionally, reporting of blasting and propane cannons for 2025 should be improved to clarify whether and how caribou are exposed.</p>
11	<p>The Proponent shall conduct noise and vibration monitoring at the project accommodations sites located at the Tiriganiaq mine site. Sampling shall be undertaken during the summer and winter months during all phases of Project development, with reporting of results and implementation of associated mitigation measures as necessary reported to the NIRB.</p>	In Progress	<p>All PPV and PW values recorded are within the DFO criteria for fish. Six (6) of the nine (9) 24-hour noise surveys recorded higher values. Noise exceedances at station NROR088 were related to seasonal helicopter flights and at station NPOR006a to the increased truck and machinery traffic related to the seasonal hauling of supplies from the barge re-supply in mid-September. The KivIA suggests additional noise survey testing outside of the seasonal periods so that the Proponent can better determine the range in noise, in order to more effectively mitigate the seasonal variations.</p>









43	<p>The Proponent shall continue to develop and implement Project-specific monitoring for the terrestrial environment through its Terrestrial Environment Management and Monitoring Plan (TEMMP), and will demonstrate appropriate refinements to design, incorporation of analytical methods and elaboration of methodologies. The TEMMP shall contain clear thresholds to allow for the assessment of long-term trends and cumulative effects where project interactions are identified. Coordination and cooperation will be required where data collection, analysis and interpretation, or responsibility for mitigation and management requires the efforts of multiple parties (e.g., government, Kivalliq Inuit Association, communities).</p>	<p>In Progress</p>	<p>(i) During 2024, through the work of the TAG, Agnico Eagle has revised TEMMP. The revised TEMMP version 5 includes refined monitoring to adapt to the increasing earlier presence of caribou during pre-calving and calving in the vicinity of Meliadine. The refinements to monitoring include the Height of Land surveys for remote calving range monitoring. The KivIA appreciates Agnico Eagle's work through the TAG to update the TEMMP during 2024 (Annual Report; Section 11.11). TEMMP version 5 (Appendix 29-17) was submitted to NIRB March 2025. In Agnico Eagle's summary of the key steps for the TEMMP version 5 revision, Agnico Eagle draws attention to three organization-members (KivIA, SDFN and GN) of the TAG and a March 8th, 2024 technical memorandum (Gunn et al. 2024) on caribou calving monitoring and mitigation recommendations for the TEMMP V5 revisions. Agnico Eagle notes that two of the three parties writing the technical memo were "organization consultants and not organization officers." For the KivIA, the technical consultant did ensure that the technical memo was discussed with and approved by the KivIA's Land Department. All technical submissions submitted by consultants on behalf of the KivIA are considered submissions of the KivIA.</p> <p>The March 2025 TAG minutes include discussion within TAG about the submission of TEMMP version 5. The KivIA noted the need to have TEMMP version 5 in place for 2025 as its Level 4 was written in the event that calving was within the triggering distance of the Melaidine Project. The KivIA agrees that recognizing that the TEMMP is a "living document" is important and that and TAG's input will lead to further modifications based on experience.</p> <p>(ii) While the Terrestrial Environment Management and Monitoring Plan (Appendix 29, Table 8) has thresholds for traffic and other mine fatalities (2 or 1 deaths/year, respectively), thresholds for sensory disturbance and the harvest study are less clear or not yet developed (Appendix 26; Section 2.6; Table 32). The harvest study threshold (s) are yet to be established. The threshold for sensory disturbance is only "&lt;10% caribou deflections from AWAR". and it is not explained why deflection is the only threshold when other behavioral responses have been measured through the monitoring. Additionally, the 2024 Annual Report states that the 10% deflection thresholds were not exceeded but does not provide data or analyses (the Commitment 38 report which does measure deflection rates only has data to 2023). Agnico Eagle</p>
----	---	--------------------	---





			<p>acknowledges that thresholds are not fully developed and are a starting point "to be tested against the results of the 2024 observational data (Table 32)" but does not specify the steps including analyses to finalize the thresholds.</p> <p><b>Recommendation:</b> (i) Agnico Eagle to develop options for TAG review in 2025 or sensory disturbance thresholds that use the behavioral monitoring and movement rates (ii) Agnico Eagle to work with TAG to develop thresholds for the harvest study.</p>
44	<p>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 Qaujimajatuqangit, 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 caribou</p>	In Progress	<p>The KivIA appreciates Agnico Eagle's efforts to revise the Commitment 38 report which was shared with TAG January 2025. While the revisions have answered many questions, the KivIA notes the high level of individual variation as a result of the collar sample size, the lack of detailed traffic data, and the strong influence of mosquito harassment on caribou movements reduce confidence in the analysis conclusions. Agnico Eagle concluded that, "In contrast to immediate challenges such as foraging and insect harassment, more static features such as the Mine footprint appear to have, at most, a negligible impact on caribou movement." (Appendix 38; Technical memo p. 30). Concerns arise as one result of the caribou reaching the vicinity of Meliadine during calving and early post-calving is that cows with young calves may be more responsive and mosquito harassment may have less of a masking impact on road crossing behavior.</p> <p><b>Recommendation:</b> The KivIA requests that Agnico Eagle expand their Commitment 38 analysis or undertake an analysis to incorporate HOL and road surveys with caribou sightings with Inuit knowledge to integrate with the collar data and with hourly/daily traffic data to demonstrate that the monitoring is adequate to test the impact predictions for caribou behavior</p>





	collar data and shall provide a copy to the NIRB prior to construction/installation of the waterlines.		relative to roads, traffic, and the changing seasonal exposure of caribou to Meliadine.
45	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. 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	In Progress	While the KivIa is aware of the collar data sharing agreement with GN and the harvest study, the KivIa notes that the Table 1 (Appendix 26) list of regional initiatives specifically mentions the wildlife surveys along the AWAR and the waterlines around the Mine site as contributing to the understanding of cumulative effects. But there are no specifics as to how this will be achieved. Table 1 also does not comment on the T&C's inclusion of special consideration for supporting regional studies of population health for the Qamanirjuaq caribou or whether such regional initiatives are underway.
46	The Proponent shall update its Terrestrial Environment Management and Monitoring Plan (TEMMP) for the Project to include a detailed harvest study prepared in consultation with the Government of Nunavut (GN) and other affected parties. The design of the harvest study should demonstrate consideration for the following: a. Hiring of a dedicated local survey coordinator through local Hunters and Trappers Organizations (HTOs) and provision of adequate resources for the HTOs to run the program; b. The potential effects on caribou populations and on caribou behaviour resulting from increased human access caused by the all weather access road and associated roads and trails; and, c. Increasing local knowledge of the project development areas, including establishing baseline harvesting levels prior to	Yes	The 2024 total estimated number of harvested caribou was 5,064 - 5,908, and 6.1% of reported harvest was within 5 km of the Meliadine AWAR which is similar to the level reported 1996 – 2001 before the AWAR was constructed (2024 Annual Report (Appendix 26; Section 13; Appendix L). The topic (b) is incompletely addressed as Agnico Eagle could work with HTO and Inuit knowledge to discuss whether and how hunting along the AWAR influences caribou responsiveness to all vehicles.

	unrestricted public access on the all-weather access road		
48	<p>In consultation with the Government of Nunavut, the Kivalliq Inuit Association, the Kivalliq Wildlife Board and local Hunters and Trappers Organizations, the Proponent shall develop appropriate monitoring and mitigation measures relating to the harvesting of caribou and improved harvesting access granted by the all-weather access road. These measures shall be included within a Road Access Management Agreement that must be in place prior to construction of phase 2 of the all-weather access road. The Road Management Agreement shall include the following specific measures:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ During periods when large aggregations of caribou (greater than 50 individuals) are observed within 1 km 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.</li> <li>37</li> <li>▪ Following consultation with the Nunavut Wildlife Management Board, as required under the Nunavut Wildlife Act, it is recommended that a no-shooting zone (1 km wide) on either side of the road should be established as a condition of public access to the AWAR and compliance with this Agnico Eagle policy should be monitored and reported by the Proponent.</li> <li>▪ Dedicated 'road monitors' should patrol the road to ensure compliance with the provisions of the Road Management Plan (SD 2-9) relating to public safety and wildlife. Monitoring should be increased during periods of road closure when large aggregations of caribou are present.</li> </ul>	In Progress	<p>The 2024 Annual Report lists that the AWAR was not closed to traffic in 2024 as the threshold of 50 caribou within 1 Km of the AWAR was not met, although on several occasions thousands of caribou were seen at greater distances from the AWAR (Appendix 26; Section 12.4.2; Appendix J). The report does not provide descriptive statistics for caribou sightings from the road surveys: for example, sighting rates are not provided or compared with previous years, or the proximity of collars, or group size relative to distance from the road during pre-calving or post-calving seasons. It is not always clear how the caribou counts triggered or did not trigger changes in mitigation levels (appendix 26; Section 12.4; Appendix J). For example, on 16 June, 3000 caribou were recorded within 8000m of the waste rock storage facility and again on 20 June when Level 1 was applied and Level 2 on 21 June.</p> <p>The 14 cameras along the AWAR did not record caribou sightings (Appendix 26 Section 12.2; Appendix I) although low numbers of caribou were photographed along the Discovery Road and at the mine site (Appendix 26; 6.2.5). The detections at the mine site were 4 June to 7 July but the report does not mention details such as location or whether the caribou were hard antlered or with young calves. The three cameras on AWAR to monitor traffic reported daily traffic frequencies by vehicle type (Appendix 26; Table 6.4.1) which is useful but the monitoring of mine site traffic from the cameras was not reported.</p> <p>Figure 5.2.3. (Appendix 26; Appendix I) suggests in most years, there is an early morning diurnal peak in camera detections raising the possibility of a relationship if hourly traffic frequencies are also lower early in the morning.</p> <p><b>Recommendation:</b> The KivA appreciates that Agnico Eagle is reporting daily traffic frequencies and requests that hourly traffic frequencies are analysed relative to the timing of the caribou detection rates during the day. The traffic detection for</p>





ᑕᑕᑦᑕᑦᑕᑦᑕ P.O. Box 340  
ᑕᑕᑦᑕᑦᑕᑦᑕ, ᑕᑕᑦᑕᑦᑕᑦᑕ Rankin Inlet, Nunavut  
X0C0G0



12

			<p>The 2024 Annual Report itself notes that the remote camera data could be integrated with other monitoring including the collars and behavior monitoring to “inform potential cumulative effects of Meliadine Mine” but the report does not outline a pathway forward. The 2024 Annual report also suggests a possible refinement of the behavioral monitoring to increase the effectiveness of road closures (Appendix 26; Section 12.1; p. 60). The refinement is to measure the responses to convoys and the KivIA is anxious to see a design to test convoys as a potential pathway to increasing mitigation effectiveness.</p> <p><b>Recommendation:</b> The KivIA requests that Agnico Eagle (i) refine the use of the collar information to trigger preparation for monitoring in anticipation of caribou arrival (behavior scans and camera installation) and (ii) propose monitoring refinement to test the behavioral responses to convoys as an approach to increasing effectiveness of mitigation.</p>
132	<p>The Proponent shall, in consultation with the groups listed as Responsible Parties above, and any other parties considered by the Group to be necessary, establish a Terrestrial Advisory Group (TAG). The TAG shall hold its first meeting prior to any construction/installation of the waterlines. The central mandate of the TAG will be to continually review and refine impact management, mitigation, and monitoring details within the Terrestrial Environment Management and Monitoring Plan (TEMMP). The TAG Members will collaborate to share and consider methods, results, and analysis from caribou and terrestrial environment studies and monitoring Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional and Community Knowledge shared by knowledge holders, and other terrestrial environment monitoring data as it becomes available. The Proponent will consider the information shared by the TAG Members for incorporation into the Project’s impact management, mitigation, and monitoring measures related to the protection of terrestrial wildlife and wildlife habitat as appropriate. Agnico Eagle shall be responsible for demonstrating how the information shared and considered by the TAG has been incorporated into the Project’s impact management, mitigation, and monitoring measures related to the protection of terrestrial wildlife and wildlife habitat as appropriate.</p>	Yes	<p>The TAG met 5 times in 2024 and was largely focused on how the shift in calving distribution should be reflected in revising the TEMMP (Appendix 38). The KivIA appreciates how Agnico Eagle records the TAG meetings and discussions and includes the detailed minutes as part of NIRB’s public record. The question of the availability of maps showing the annual calving distribution was raised in the KivIA’s review of the 2023 Annual Report. Agnico Eagles responded to the questions by stating that the information provided to the TAG would be available but in 2024, this is only partially the case. Two presentations about the Agnico Eagle’s methods to map calving and about trends in core calving since 2017 are not included in the 2024 Annual Report or Agnico Eagle’s web site. The presentations were from the 2024 January and March TAG meetings. Agnico Eagle should include the presentations on calving (and also noise monitoring) as part of the annual reporting. The KivIA notes that concerns about how the Qamanirjuaq calving was shifting were raised during the public hearings for the Meliadine mine extension project in 2023. During 2024, TAG discussions on updating the TEMMP, Agnico Eagle provided maps of the shift in calving relative to the Meliadine mine. The updated TEMMP only has calving maps up until 2022. Despite the importance of the Kivalliq public understanding how calving is monitored and mitigated, the calving maps are not part of the 2024 annual reporting of TAG.</p> <p><b>Recommendation:</b> The KivIA requests that Agnico Eagle ensures that all presentations to the TAG are included as</p>

			accessible copies as part of the TAG minutes and will be included in the Annual TAG report.
133	<p>The Proponent shall update the Ocean Discharge Monitoring Plan to include additional monitoring conducted to validate that the volume and/or quality of water discharged into the marine environment via the waterlines does not have acute or chronic adverse effects on the marine environment, including marine water quality, marine mammals, fish, shellfish and other organisms and marine sediment. At a minimum, the additions to the updated Ocean Discharge Monitoring Plan shall include: post-discharge monitoring in the receiving environment to validate that the concentrations of saline effluent measured 100 m from the diffuser reach near zero before ice formation;</p> <ul style="list-style-type: none"> <li>• the sublethal toxicity testing program developed and implemented by the Proponent in consultation with Environment and Climate Change Canada, including: <ul style="list-style-type: none"> <li>o any benthic invertebrate studies conducted by the Proponent;</li> </ul> </li> <li>• any community-based shellfish monitoring program developed and implemented by the Proponent in consultation with the Kivalliq Wildlife Board; and</li> <li>• monitoring conducted by the Proponent of the marine environment (including marine water quality, marine mammals, fish, shellfish and other organisms and marine sediment) under the regulatory requirements (regulations, authorizations and permits) applicable to the Waterlines Proposal</li> </ul>	In Progress	<p>Marine discharge has been paused at the Meliadine site. The Proponent has provided updates to the KivIa on sublethal toxicity testing results, and the KivIa is confident that appropriate treatment methods will mitigate adverse effects to the marine environment upon resumption of marine discharge.</p>



### 3. Closing

The KivIA appreciates the opportunity to provide comments on the 2024 Annual Report for the Meliadine Project. Please contact Luis Manzo, Director of Lands, ([dirlands@kivalliqinuit.ca](mailto:dirlands@kivalliqinuit.ca)) should you require more information.

Regards,

Luis Manzo P, Ag.  
Director of Lands  
Kivalliq Inuit Association  
Tel: (867) 645-5731  
[dirlands@kivalliqinuit.ca](mailto:dirlands@kivalliqinuit.ca)

