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June 23, 2025

NIRB File #: 03MN107  
& 16MN056

**Sent VIA Email: [info@nirb.ca](mailto:info@nirb.ca)**

**Re: Comment Request for Agnico Eagle’s Meadowbank Complex 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 Meadowbank Complex Project, NIRB File #s: 03MN107 & 16MN056.

The GN has reviewed the 2024 Annual Report and related documents and has two (2) comments, attached to this letter, to raise with the Board at this time. These comments are primarily concerned with analyses of caribou behaviour near the Project's roads.

Agnico Eagle's reporting indicates that the vast majority of caribou cross Project roads during brief periods of road closure. The GN is concerned that these results could indicate that caribou are actively avoiding the roads while they are being used and waiting to cross until they're closed. The GN has raised this concern in previous AR submissions and recommends that the Proponent conduct additional analyses to assess the degree to which road closure is affecting the timing and character of caribou crossings.

In a related behavioural analysis, the Proponent characterized caribou walking as a behaviour distinct from feeding or lying down, and that walking behaviour was more likely on the upstream side of the road, prior to crossing; after crossing, caribou were more likely to be feeding or lying down. The Proponent also found that disturbances led to an increase in the proportion of caribou walking. These findings suggest that walking may be one behavioural response to disturbance from the road. The GN recommends that the Proponent amend the study design to include direction of travel from roads and/or other sources of disturbance to investigate how caribou are reacting to sources of disturbance and if road traffic is among them.

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](mailto:jbuller@gov.nu.ca).

Thank you,



Justin Buller  
Interim Avatiliriniq Coordinator  
Government of Nunavut

GN AR # 01	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Caribou Road Crossings
<b>Terms and Conditions</b>	28 (Project Certificate No. 008, Amendment No.1)
<b>References</b>	<ul style="list-style-type: none"> <li>• Agnico Eagle Mines Limited – Meadowbank Complex. Agnico Eagle Meadowbank Complex 2024 Annual Report 61-000-100-REP-007 (March 2025)</li> <li>• Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mine’s Meadowbank and Whale Tail Project 2021 Annual Report (June 2022)</li> <li>• Government of Nunavut. Government of Nunavut Comments on Agnico Eagle’s Meadowbank Complex 2022 Annual Report (June 2023)</li> </ul>
IDENTIFICATION OF ISSUE	
<p>The Agnico Eagle Meadowbank Complex 2024 Annual Report (2024 AR), states that most caribou crossing events observed on the All-Weather Access Road (AWAR) and the Whale Tail Haul Road (WTHR) occurred on days with a 24-hr or partial closure.</p> <p>The Government of Nunavut (GN) is concerned that the above results potentially reflect caribou avoidance behaviour of open roads. The GN believes that an in-depth analysis of the caribou crossing data is needed to monitor project effects and inform adaptive management.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Section 8.18.2 of the 2024 AR includes a summary of caribou that were observed crossing Project roads in 2024. Specifically, this section states:</p> <p>“...[f]or annual caribou crossing observations on the AWAR, 82% (7,595 of 9,243 caribou) of observed crossing events occurred on dates with an AWAR closure...” (Agnico Eagle, 2025, p.339)</p> <p>And</p>	

“...[f]or annual caribou crossing observations on the WTHR, 96% (2,376 of 2,468 caribou) of observed crossing events occurred on dates with a WTHR 24-hour closure or partial closure, and 4% (89 of 2,468 caribou) occurred on a day with a speed or access restriction in place...” (Agnico Eagle, 2025, p.340)

The GN believes that the above results could indicate that caribou actively avoid crossing roads when they are open. The GN has flagged this concern in previous years (GN, 2022; GN, 2023). For example, in response to the Proponent’s 2021 Annual Report, the GN presented a rudimentary analysis that illustrated that caribou were 2 to 4 times more likely to be observed crossing closed versus open roads (GN 2022, GN AR #05 – Remote Camera Study). As such, the GN suggested that caribou may be avoiding open roads, rather than crossing solely due to well-timed closures.

To adequately monitor Project effects and the effectiveness of mitigation, the Proponent should undertake analyses to distinguish between effective mitigation and avoidance behaviour with respect to caribou crossing.

#### **REQUEST(S)/RECOMMENDATION(S)**

The GN recommends that the Proponent conduct separate analyses for the AWAR and the WTHR using road survey data from 2019–2024 to test whether:

1. Caribou are more likely to cross roads when they are closed than when they are open, after accounting for factors like caribou numbers, distance from roads, and survey effort; or, if
2. Road closures are effective because they occur when caribou are near roads and likely to cross.

This information will help the GN monitor project effects and the effectiveness of the Proponent’s mitigations in protecting caribou that may interact with the Project.

GN AR # 02	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Caribou Behaviour Study
<b>Terms and Conditions</b>	28 (Project Certificate No. 008, Amendment No.1)
<b>References</b>	<ul style="list-style-type: none"> <li>• Agnico Eagle Mines Limited – Meadowbank Complex. Appendix 39: Meadowbank and Whale Tail 2024 Wildlife Monitoring Summary Report, Part 8 (March 2025a)</li> <li>• Agnico Eagle Mines Limited – Meadowbank Complex. Appendix 39: Meadowbank and Whale Tail 2024 Wildlife Monitoring Summary Report, Part 9 (March 2025b)</li> </ul>
IDENTIFICATION OF ISSUE	
<p>Agnico Eagle’s Meadowbank and Whale Tail 2024 Monitoring Summary Report (2024 WMSR) presents the Meadowbank Mine 2024 Caribou Behaviour Study.</p> <p>To strengthen the interpretation of the 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 and the GN and other intervenors reviewing future Caribou Behaviour Study reports to determine whether the walking behaviour by caribou reflects a response or non-response to disturbance.</p> <p>Better understanding of caribou behaviour helps the GN understand the potential impacts from the project to caribou, and the effectiveness of mitigation, monitoring and management actions by the Proponent.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>As detailed in the 2024 Caribou Behaviour Study, the Project’s Terrestrial Advisory Group (TAG) had previously recommended various changes to the Caribou Behaviour Study protocol land analysis methods, including “...testing whether the behaviour “walking” could be considered a response behaviour...” (Agnico Eagle, 2025a, pp. 13–</p>	

14). This change was recommended to understand whether and to what extent walking behaviour by caribou was a response to Project-related disturbances.

Walking was incorporated as a behaviour category in the 2024 Caribou Behaviour Study and defined as “Walking similar to standing posture but moving at a slow gait (<5 km/h).” (Agnico Eagle, 2025b, p. 41).

Concerning walking, the 2024 Caribou Behaviour Study found that:

“...disturbances were found to statistically affect the proportion of caribou walking. In both 2023 and 2024 disturbances were found to statistically increase the proportion of caribou walking...” (Agnico Eagle, 2025a, p. 7)

And

“...[r]oad closure status did not affect response behaviour, though the road being open was positively correlated with walking behaviour...” (Agnico Eagle, 2025a, p. 8)

And

“...caribou were more likely to be walking on the upstream side of the road. The dominant behaviours on the downstream side were feeding or laying down...” (Agnico Eagle, 2025a, p. 8)

These results suggest that walking may be a response behaviour to disturbance.

While 2024 Caribou Behaviour Study categorizes walking as a distinct behaviour, it does not clearly distinguish whether it reflects a response to disturbance. To address this, information should be collected and subsequently incorporated into analyses on the direction of travel of caribou. This will help determine whether caribou are walking toward, away from, or parallel to potential disturbances such as roads and vehicles.

The GN can use this information to better understand the effectiveness of monitoring, management and mitigation measures undertaken by the Proponent to minimize or avoid impacts to caribou from the Project and its activities.

#### **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.