



To: Keith Morrison
Manager, Project Monitoring,
Nunavut Impact Review Board

Date: June 24, 2025

1. Introduction

The Kivalliq Inuit Association (KivIA) has conducted a review of the Agnico Eagle Mines Ltd. (Agnico Eagle) 2024 Annual Report for the Meadowbank Complex Gold Project, including both the Meadowbank and Whale Tail sites. Agnico Eagle's submission consisted of the Meadowbank Complex 2024 Annual Report supported by 63 appendices. These documents were submitted by to address requirements within the following authorizations:

Meadowbank

- NIRB Project Certificate No. 004;
- KivIA Production Lease KVPL08D280;
- KivIA Quarry Lease KVCA06Q11; and
- KivIA Right of Way KVRW06F04

Whale Tail

- NIRB Project Certificate NO. 008 Amendment 001;
- KivIA Production Lease KVPL17D01;
- KivIA Quarry Lease KVCA15Q01, KVCA15Q02, KVCA18Q01; and
- KivIA Right of Way KVRW15F01.

KivA has completed this review with the support of the following consultants:

- Anne Gunn, terrestrial specialist;
- Prairie Scientific Inc. (PSI; Matt McDougall), aquatic environment specialist; and
- GeoVector Management Inc. (GeoVector; Alan Sexton), geoscience specialist.

Review of the compliance with the Project Certificate on Terms and Conditions relating to the KivIA is in section 2 of this technical memorandum, while section 3 contains additional technical comments.



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	preconstruction baseline harvesting data, to be developed in consultation with local HTOs, the GN-DOE and the Nunavut Wildlife Management Board		along the AWAR compared to before construction (Appendix 39; Section 10.0 Hunter Harvest Study Table 10.1; Appendix F. Part 2, p. 4.32). Prior to construction, between 1996 and 2001, 18% of caribou harvested were within 5 km of the AWAR's future route compared to the 2024 harvest (48%). Appendix F does not have descriptive statistics but the increase can be calculated as 39% (1.4 Standard Error). The stated only threshold is for the RSA: that changes will not exceed 20% of historical harvest activities within the RSA. The 2024 Annual Report states that the RSA threshold was not exceeded although it does not provide any details about how the threshold is calculated. Although Table 10.1 specifies that the RSA threshold was not exceeded, the table does specify "Future discussion with HTO and GN representatives required to identify management options". Recommendation: The KivIA requests that Agnico Eagle describe how the 20% threshold for the RSA is calculated and how a threshold for the harvest within 5km of the AWAR will be determined.
55	Annual Wildlife Summary Monitoring Report	Yes	2024 is 19th annual report for Meadowbank project. Recommendation: For the 20th Annual Report, the KivIA recommends that it would be useful to summarize how Agnico Eagles and TAG have adapted monitoring to changing knowledge of caribou responses, mine operations and environmental conditions. The summary would be useful for future environmental assessments to minimize 're-inventing the wheel'; it would be useful for considering on-going monitoring programs at other mines and it would be in keeping with Project Certificate 008 T&C 11.
56	Maps of caribou migration corridors shall be developed in consultation with Elders and local HTOs, including Chesterfield Inlet and placed in site offices and upgraded as new information on corridors becomes available. Information on caribou migration corridors shall be reported to the GN, KIA and NIRB's Monitoring Officer annually	In Progress	Agnico Eagle (Section 18.8.3) updated information (Appendix 39) notes, "to initiate migratory corridor consultation discussions in 2025." Recommendation: The KivIA requests that Agnico Eagle ensures that draft maps of migration corridors from the collared caribou should be discussed with the Elders especially in the context of changing patterns over time. The Elders' knowledge should be included on the mapped migration corridors.
58	In consultation with Elders and the HTOs and subject to safety requirements, design the lighting and use of lights at the mine site to minimize the disturbance of lights on sensitive wildlife and birds.	No	Agnico Eagle (Section 18.8.3) does not specifically mention whether and how consultations contributed to mitigating impact of lights. Meadowbank and Whale Tail sites are visible from space at night which raises questions about the disturbance of lights. Recommendation: The KivIA requests that Agnico Eagle summarize the discussions with the Elders about lighting to minimize disturbance to sensitive wildlife.
59	In consultation with Elders and the HTOs, design and implement means of deterring caribou from the tailing ponds, such as	No	In 2024, construction activity in the vicinity of the tailings storage was thought to have deterred caribou (Annual Report Section 8.18.11) and there is no mention of ribbons or inukshuks or



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	temporary ribbon placement or Inukshuks, with such designs not to include the use of fencing		reference to an earlier report. In 2024, the TAG has been involved with discussions about the roadside flags disturbing migrating caribou which may be relevant to T&C 60. Recommendation: The KivIA requests that Agnico Eagle confirm whether discussions were held about the use of ribbons or inukshuks and whether a summary report is available and whether the ribbons or inukshuks were tested.
60	Whenever practical, Cumberland shall implement a stop work policy when wildlife in the area may be endangered by the work being carried out	In Progress	Agnico Eagle (Section 8.18.9) includes road closures and road monitoring in response to this T&C. The scale of caribou exposure in 2024 to the AWAR and WTHR is high: a total of 56,168 caribou sightings (Appendix 39. Section 3.6). Implementing this T&C for an operational mine is taxing as the AWAR was closed for 40 days (24 hours) and WTHR for 22 days (Appendix 39; Section 3.6.6.). The KivIA appreciates Agnico Eagle's work with the TAG for enhanced protocols for the spring and fall migration (2024 Annual Report Section 2.1).
61	In consultation with EC, Cumberland shall incorporate into the Terrestrial Ecosystem Management Plan and the Air Traffic Management Plan a commitment for aircraft to maintain (whenever possible) a cruising altitude of at least 610 metres during point to point travel when in areas likely to have migratory birds, and 1000 metres vertical and 1500 metres horizontal distance from observed concentrations of migratory birds, and use flight corridors to avoid areas of significant wildlife importance	In Progress	Agnico Eagle monitors helicopter flight paths and their altitudes in detail (Appendix 39 Section 4.5.9). In 2024, helicopter flight paths below 562m altitude and within 2000m co-occurred on 14 occasions for muskoxen and 11 for caribou during summer and late spring. Behavioral responses were not described.
85	Develop a detailed blasting program to minimize the effects of blasting on fish and fish habitat, water quality, and wildlife and terrestrial VECs	In Progress	In 2024, 41 small groups of caribou were recorded during 203 pre-blast surveys over 176 days at Whale Tail mine (Appendix 39; Section 9.5.2.2; Figure 9.1). Although there were 224 blasts at Whale Tail and IVR pits, the behavior of only three caribou groups was recorded. Recommendation; The KivIA does not agree with Agnico Eagle's recommendation to either conclude that the blasting does not impact caribou or that the threshold for suspending blasting should be reduced from 3 km. Although the opportunities to record the behavioral responses appear to be rare, sample size is inadequate to modify efforts given the strength of Inuit concerns over blasting and caribou.



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TC #	Terms and Conditions Project Certificate 008 Amendment 1	Compliance with Project Certificate (Yes/No/In Progress)	Additional Comments
11	The Proponent shall maintain the Environmental Impact Statement and the environmental monitoring programs developed for the Project, with predictions updated as new baseline data is collected. If the results of monitoring programs necessitate updates to effects predictions, the Proponent shall update the associated management programs and plans as required to address or reflect the updated assessment of effects.	In Progress	<p>T&C 11 and Project Certificate No. 004's Appendix D (the Post-Environmental Assessment Monitoring Program (PEAMP) both require assessing and updating predicted effects and adaptive management based on monitoring data. The 2024 Annual Report (Section 12) describes PEAMP, but PEAMP is not referenced in Appendix 39 which has the detailed monitoring data to describe and interpret observed effects relative to predicted effects including the effectiveness of monitoring and mitigation. The Annual Report summarizes the effects predicted in 2005 and 2018 (Meadowbank and Whale Tail assessments). Sensory disturbance from mine activities was added as a primary pathway in 2018 (Annual Report Section 12; Table 12.2, 12.26). But in 2024, sensory disturbance and barriers to migration were removed as primary pathways (although monitoring will continue) because Agnico Eagle has not, itself, provided quantitative thresholds. The KivIA is concerned as now assessing the impacts of the Meadowbank Project are limited to habitat changes. The KivIA has previously and continues to request that behavior monitoring, movements monitoring and Inuit knowledge can provide quantitative thresholds which will allow assessment of project impacts.</p> <p>Recommendation: The KivIA requests that Agnico Eagle draft options for quantitative thresholds for sensory disturbance and migration barriers for TAG review in 2025.</p>
27	The Proponent shall participate in a Terrestrial Advisory Group with the Government of Nunavut, the Baker Lake Hunters and Trappers Organization, the Kivalliq Inuit Association, and other parties as appropriate to continually review and refine mitigation and monitoring details within the Terrestrial Ecosystem Management Plan. Additional caribou collar data, results from associated studies, Inuit Qaujimagatuqangit shared by knowledge holders, and other monitoring data as available should be considered for incorporation as appropriate. Finalized Terms of Reference for the Terrestrial Advisory Group	In Progress	<p>The KivIA appreciates Agnico Eagle's efforts to collaborate with the TAG in 2024 and especially appreciates the detailed minutes and the presentations that are circulated to TAG members. Agnico Eagle summarizes the TAG meetings in 2024 (Section 8.18.12.1)but does not include the presentations or minutes.</p> <p>Recommendation: Agnico Eagle should specify where the complete minutes and presentations are archived and available as part of the public record for Meadowbank and Whale Tail. Project Certificate 008; Section 4.1; No. 12; p. 12/49 states: " The Proponent shall establish a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to regulatory authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project.</p>



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	shall be provided to the NIRB within six (6) months of issuance of the Project Certificate. A summary of outcomes from Terrestrial Advisory Group meetings shall be provided to the NIRB on an annual basis in the Proponent's Annual Report....		
28	The Proponent shall maintain a Terrestrial Ecosystem Management Plan (TEMP) throughout all phases of the Project. The Plan shall include detailed monitoring, mitigation, and adaptive management measures for wildlife, with consideration for each Project activity predicted to affect wildlife, and with inclusion of specific triggers for mitigation and adaptive management intervention. The TEMP shall demonstrate consideration for all relevant commitments made by the Proponent throughout the Nunavut Impact Review Board's review of the Project. Updates to the TEMP may be required when there are significant changes in project development plans, monitoring results indicating biologically-meaningful changes, significant updates to the scientific understanding of management methods relevant to wildlife at the project site, Inuit Qaujimajatuqangit, Traditional Knowledge, changes in climatic conditions that might subject wildlife to unexpected impacts, or as otherwise necessary.	Yes	See comments for Project Certificate 004, T&C 54. The KivIA notes that the TEMP 9.0 now includes detailed monitoring and innovative steps such as Let the Leaders Pass for spring migration and analyses to examine the timing of fall migration.
29	The Proponent shall, in collaboration with the Government of Nunavut, collect additional caribou collar data and conduct analyses of this data to quantify the zone of influence and associated effects of project components on caribou movement for a study area that includes the Whale Tail mine site, the haul road, the Meadowbank Gold Mine and its All-Weather Access Road. A summary of the analyses and associated effects shall be provided annually in the Proponent's annual report to the Nunavut Impact Review Board	In Progress	The KivIA appreciates the maps showing seasonal movements by herd (Appendix 39; Section 6.2.1) as a step toward a more detailed analysis of the collared caribou relative quantifying the Zone of Influence and caribou responses to project components. A previous GN-led study of caribou responses to WTHR was published in 2025 but is only for spring migration 2011-2019 and did not include traffic frequency (Boulanger et al. 2025). Recommendation: Agnico Eagle should work with TAG to design an analysis to meet T&C 29.





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30	<p>The Proponent shall work with the Government of Nunavut, the Baker Lake Hunters and Trappers Organization and the Kivalliq Inuit Association through the Terrestrial Advisory Group to develop and update thresholds to trigger implementation of mitigation measures on both the AWAR and Whale Tail Haul Road, up to and including temporary road closures. The Proponent shall consider how these thresholds and mitigation measures reflect caribou life cycle sensitivities as well as demonstrate how Inuit Qaujimajatuqangit was incorporated throughout the development of these criteria and procedures. The Proponent shall ensure the Terrestrial Ecosystem Management Plan is updated to reflect the thresholds agreed upon in accordance with the Terrestrial Advisory Group Terms of Reference, and that this Plan along with a summary of consultation with the Terrestrial Advisory Group are submitted on an annual basis or as thresholds are otherwise modified in the Proponent's annual report to the Nunavut Impact Review Board.</p>	In Progress	<p>In 2024, 82% (7,595 of 9,243 caribou) of observed crossing events occurred on dates with an AWAR closure. For WTHR, 96% (2,376 of 2,468 caribou) of observed crossing events were during 24-hour closure or partial closures. The trigger for road closures (Group Size Threshold) is the group size at, or above which, 75% of caribou observed interacting with road are expected to occur and is based on caribou groups between 250 and 1000m of the road (Appendix 39, Section 3.6.3.1) using the road monitoring to examine the relationship between group size and distance from the road during the different caribou seasons.</p> <p>Recommendation; The KivA requests that Agnico Eagle undertake analyses to describe group sizes relative to distance from the roads as an assessment of the group size threshold for road closure.</p>
31	<p>The Proponent shall develop and implement a Road Access Management Plan and maintain traffic monitoring logs along the haul road between the Whale Tail Pit project and the Meadowbank mine. Where traffic exceeds levels predicted within the Environmental Impact Statement, the Proponent shall develop and implement appropriate modifications to its wildlife protection measures. The Road Access Management Plan shall be provided to the Nunavut Impact Review Board (NIRB) 90 days prior to operations commencing. An annual summary of the monthly maximum, minimum and average traffic levels shall be provided to the NIRB in the Proponent's annual report.</p>	In Progress	<p>Traffic frequencies are high when set in the context of caribou responses; for example, in 2024, the WTHR traffic log recorded an annual total of return trips involving 143,764 vehicle passages (2024 Annual Report; Section 11.7.1.2.).</p> <p>T&C 31 requires monthly traffic which is met in the 2024 Annual Report. But the KivA notes that hourly or daily traffic frequencies are essential to describe the effectiveness of mitigation and caribou responses. In 2024, an objective for the remote camera project included traffic monitoring but no results are reported (Appendix 39; Section 8.2). Instead, at the fall 2024 TAG meeting, Agnico Eagle announced a new study design will be developed to quantify daily traffic rates on the AWAR and WTHR, to estimate duration of convoys, and to examine caribou crossings in relation to vehicle traffic.</p> <p>Recommendation: The KivA is keenly supportive of a study design to measure responses to convoys, including daily and hourly traffic for implementation in time for 2025 fall migration.</p>
32	<p>The Proponent shall engage with the Baker Lake Hunters and</p>	In Progress	<p>The 2024 Annual Report (Section 8.18.13) refers to the berms at Km127 on the WTHR as being modified after advice from Baker Lake</p>



<p>Trappers Organization and other relevant parties to ensure that safety barriers, berms, and designed crossings associated with project infrastructure, including the haul road, are constructed and operated as necessary to allow for the safe passage of caribou and other terrestrial wildlife. Summaries of engagement with the Baker Lake Hunters and Trappers Organization regarding implementation of this condition shall be provided to the Nunavut Impact Review Board along with details of the selected crossings in the Proponent's annual report to the Nunavut Impact Review Board.</p>	<p>HTO but there is no report referenced or description. The importance of the details is that they may be helpful in designing and building roads elsewhere. TEMP version 9.0 in reference to T&C 32 refers to the TEMP annual report without specifying which section</p> <p>Recommendation: The KivIA requests that Agnico Eagle provide more detail of how the slopes at Km127 were modified; how it relates to the rest of WTHR; whether there was a change in caribou use and whether there is a report with the details.</p>
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There are no additional technical comments at this time.

Regards,

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