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Building *Nunavut* Together
Nunavut liuqatigiingniq
Bâtir le *Nunavut* ensemble

Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board
P.O Box 1360
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June 23, 2025

NIRB File #: 05MN047
& 12MN001

Sent VIA Email: info@nirb.ca

Re: Comment Request for Agnico Eagle's Doris North Gold Mine Project and Phase 2 Hope Bay Belt 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 Doris North and Hope Bay Belt Project, NIRB Files #: 05MN047 & 12MN001.

The GN has reviewed the 2024 Annual Report and related documents and has four (4) comments, attached to this letter, to raise with the Board at this time. These comments are primarily concerned with data gaps, missing information, and complete implementation of mitigation and monitoring plans.

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	Snowbank Monitoring
Terms and Conditions	20 (Project Certificate No. 009).
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Hope Bay. Agnico Eagle’s Response to Comments on the 2023 Annual Reports for the Hope Bay Project, Project Certificate No. 003 and Project Certificate No. 009 (August 2025) • Agnico Eagle Mines Limited – Hope Bay. 2024 Annual Report (April 2025) • Agnico Eagle Mines Limited – Hope Bay. Hope Bay Mine 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025) • Government of Nunavut. Government of Nunavut Comment on 2023 Annual Report for the Doris North and Phase 2 Hope Bay Belt Projects, NIRB File #05MN047 & 12MN001 (July 2024)
IDENTIFICATION OF ISSUE	
<p>Agnico Eagle (AEM or the Proponent) did not provide the snowbank height monitoring information previously requested by the Government of Nunavut (GN), despite committing to do so during the 2023 Annual Report period.</p> <p>Snowbank height monitoring is important to the GN’s monitoring of the Project, as snowbanks could act as a barrier to wildlife movement.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Proponent, in response to GN AR# 01 - Snowbank Monitoring (GN, 2024), stated that “Agnico Eagle will confirm in the 2024 Annual Report that the snowfall amounts during the snowbank height monitoring program were within long-term averages before discontinuing the snowbank height monitoring program.” (Agnico Eagle, 2024, p. 80)</p>	

However, the GN notes that this information is not in the Agnico Eagle Hope Bay 2024 Annual Report (2024 AR) or the Hope Bay Mine 2024 Wildlife Mitigation and Monitoring Program Compliance Report (2024 WMMP Compliance Report).

Additionally, AEM indicates that “...the snowbank monitoring program will be discontinued and the [Wildlife Mitigation and Monitoring Plan] will be updated accordingly.” (Agnico Eagle, 2024, p. 22)

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake a review to confirm that snowfall during the monitoring program (2020–2023) was within climate norms and averages.

GN AR # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Traffic Monitoring
Terms and Conditions	20 (Project Certificate No.009)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Hope Bay. 2024 Annual Report (April 2025a). • Agnico Eagle Mines Limited – Hope Bay. Hope Bay Project 2024 Wildlife Mitigation and Monitoring Program (April 2025b) • Agnico Eagle Mines Limited – Hope Bay. Wildlife Mitigation and Monitoring Plan (April 2025c)
IDENTIFICATION OF ISSUE	
<p>The Proponent's 2024 WMMP Compliance Report only includes three months of traffic monitoring data, with inconsistent or missing explanations for these data gaps. Despite these data gaps, the Proponent concludes that the information is sufficient for reporting purposes and that no additional evaluation of wildlife protection measures is necessary. Additionally, the Proponent makes no commitments to ensure data gaps are reduced in future years.</p> <p>The absence of this information makes it difficult for the GN to evaluate the accuracy of the Final Environmental Impact Statement (FEIS) predictions and determine the effectiveness of mitigation measures.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>In the WMMP the Proponent indicates that:</p> <p>“...Traffic monitoring will track the volume and composition of lightweight vehicles (e.g., pick-up trucks) and heavy equipment (e.g., haul trucks and other heavy equipment) on Mine roads, summarizing the information seasonally and annually to address Project Certificate Term and Condition 20 (NIRB 2018). The data will be used to determine monthly traffic volumes in the form of maximum, minimum and average daily return trips throughout the year for the two vehicle classes on each mine road segment.</p>	

This traffic data will be compared against FEIS traffic predictions (TMAC 2017). If traffic rates exceed those in the FEIS by 25% in two consecutive months, a revised assessment of potential impacts of traffic on wildlife will be conducted..." (AEM, 2025c, p. 30)

Section 2.2 of the 2024 WMMP Compliance Report presents summary information of traffic data derived from two wildlife cameras located along the two transit routes: 1) Roberts Bay–Doris Camp (Camera 18) and 2) Doris Camp–Madrid North (Camera 35) (AEM, 2025b, p. 32).

In the 2024 AR, the Proponent concludes:

"Traffic levels were compiled from the vehicles recorded on wildlife cameras between Roberts Bay and Doris and between Doris and Madrid. Traffic levels exceeded daily average predictions between Roberts Bay and Doris; however, these did not occur in two consecutive months and as such no additional evaluation of wildlife protection measures is required. Traffic levels between Doris and Madrid were below predictions from the Madrid-Boston FEIS." (AEM, 2025a, p. 89)

The GN disagrees with this conclusion, noting that only 3 months of data (June to July 2024) are included in the 2024 WMMP Compliance Report. For months with missing data, the Proponent's explanations are either lacking or inconsistent. For example, the Proponent notes in captions under Tables 2.2-2 and 2.2-3 that, "Vehicle traffic data unavailable for both Roberts Bay to Doris, and Doris to Madrid North in October to December 2023, and January to May 2024" (AEM, 2025b, p. 33).

However, the Proponent explains the absence of the Doris–Madrid route data, stating, "...[c]amera data were not available along the Doris to Madrid route (camera 35) in September 2023 to May 2024 due to camera card malfunctions" (AEM, 2025b, p. 33). The GN acknowledges that field equipment issues can arise. However, the Proponent has not explained in the 2024 WMMP Compliance Report how similar issues will be prevented in future years. Additionally, no rationale is provided for why vehicle traffic data was not available for the Roberts Bay to Doris route.

Furthermore, the Proponent attributes the absence of post-August data to the timing of camera checks (AEM, 2025b, p.31). However, the Proponent does not include any statements regarding how they will improve the timing of camera checks to ensure they are meeting reporting requirements.

Finally, the GN notes that while the 2024 WMMP indicates that information will be collected about vehicle composition (i.e., lightweight vehicles and heavy equipment; AEM, 2025c, p. 30), this information is not described in the 2024 WMMP Compliance Report.

REQUEST(S)/RECOMMENDATION(S)
<p>The GN requests that the Proponent undertake the following:</p> <ol style="list-style-type: none">1. Justify the conclusion that no additional evaluation of wildlife protection measures was needed in 2024, despite several months of missing data during the reporting period.2. Explain the absence of data for the Roberts Bay–Doris (camera 18) during the reporting period.3. Describe how field equipment issues (e.g., camera card malfunctions) will be prevented in future years (e.g., system redundancy).4. Provide additional details on vehicle composition (lightweight vehicles and heavy equipment) in future annual reports.

GN AR # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Aircraft Monitoring
Terms and Conditions	29 (Project Certificate No.003, Amendment No.002) 4, 22 (Project Certificate, No 009)
References	<ul style="list-style-type: none"> • Agnico Eagle Mines Limited – Hope Bay. Hope Bay 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025a) • Agnico Eagle Mines Limited – Hope Bay. Wildlife Mitigation and Monitoring Plan (April 2025b) • Agnico Eagle’s Response to Comments on the 2023 Annual Reports for the Hope Bay Project, Project Certificate No. 003 and Project Certificate No. 009 (August 2024) • Government of Nunavut. Government of Nunavut Comment on 2023 Annual Report for the Doris North and Phase 2 Hope Bay Belt Projects, NIRB File #05MN047 & 12MN001 (July 2024)
IDENTIFICATION OF ISSUE	
In the 2024 WMMP Compliance Report, the GN notes recurring deficiencies in the information provided for helicopter and fixed-wing aircraft reporting. These gaps make it challenging for the GN to evaluate the accuracy of FEIS predictions and assess compliance with the WMMP.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>In the 2024 WMMP Compliance Report, the Proponent states:</p> <p>“The majority of helicopter and fixed-wing aircraft flight traffic levels were below levels predicted in the Madrid-Boston FEIS. Helicopter traffic in the Doris area was higher than predicted maximums because of the Madrid drilling program; however, this exploration program was not included in the Madrid-Boston FEIS. To prevent impacts to wildlife, helicopters maintained 300 m vertical and 600 m</p>	

horizontal separation (including starts and takeoffs) from caribou and muskox.” (AEM, 2025a, p. 5)

The Proponent reports that 3,177 helicopter trips took place in 2024, with 359 of these flights being transports and 2,819 of these flights being related to exploration activities (AEM, 2025, p. 34). Additionally, the Proponent reports average daily trips for fixed-wing aircraft in Table 2.3-1 as 1.25 average daily trips for Doris and 0 average daily trips for Boston (AEM, 2025a, p. 34).

The GN notes recurring reporting deficiencies in the 2024 WMMP Compliance Report, as previously raised in response to the Proponent’s 2023 Annual Report (GN, 2024; GN AR # 04: Aircraft – Wildlife Protection).

For example, in 2024, the GN requested additional summary statistics on daily helicopter and fixed-wing flights to evaluate consistency with FEIS predictions (GN, 2024). In response, the Proponent committed the following:

“Agnico Eagle will present the minimum, maximum, and mean of weekly flights to compare against the predictions of the FEIS to continue to verify that these predictions were accurate.” (AEM, 2024, p. 84).

However, the GN did not find this information within the 2024 WMMP Compliance Report.

Additionally, the GN previously requested the Proponent to provide specific information (e.g., flight log information or maps depicting flight paths) to verify the Project’s compliance with minimum flight altitudes and horizontal setback distances as described in the WMMP (e.g., sections 2.2.2, 2.7; AEM, 2025b) (GN, 2024). However, the GN did not find this information in the 2024 WMMP Compliance Report.

The absence of this information limits the GN’s ability to evaluate the Proponent’s compliance with the mitigation measures set out in the WMMP. This information is needed for the GN to evaluate the accuracy of the FEIS predictions, and consequently, the impacts from the Project and its activities on wildlife.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Where applicable, provide the minimum, maximum and mean of daily aircraft flights for comparison against FEIS predictions about daily flights.
2. Where applicable, provide flight logs that include information such as date, flight purpose, flight distance, flight’s mean height above ground level (m), justification for low-level flights, wildlife observations made by the pilot and any course corrections made as a result.

GN AR # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Cameras
Terms and Conditions	22 (Project Certificate No. 003, Amendment No.002) 19 (Project Certificate No.009)
References	Agnico Eagle Mines Limited – Hope Bay. Hope Bay 2024 Wildlife Mitigation and Monitoring Program Compliance Report (April 2025)
IDENTIFICATION OF ISSUE	
<p>Throughout the 2024 WMMP Compliance Report, the Proponent describes changes to the wildlife camera program. These changes include discounting the use of wildlife cameras in the Boston Area and reducing the analysis of wildlife camera data from annual to every three years.</p> <p>The GN's concerns with these changes include 1) the rationale for changing the frequency of analyses and 2) the ability of the GN's ability to determine the effect of the Project on wildlife as a result of reduced data collection in the Boston Area.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p><u>Camera Monitoring Program (Analysis Frequency)</u></p> <p>In the 2024 WMMP Compliance Report, the Proponent states,</p> <p style="padding-left: 40px;">“...[c]amera data are statistically analyzed ... to investigate potential differences in the occurrence of caribou within the Treatment zone, Control zone, and ZOI, and to monitor areas of possible bear attractants, such as the Roberts Bay Waste Management Facility...” (AEM, 2025, p. 65)</p> <p>Concerning the frequency of these analyses, the Proponent explains,</p>	

“[the Inuit Environment Advisory Committee (IEAC)] agreed to keep the cameras around Doris and Madrid, but to complete the camera analysis every 3 years rather than annually.” (AEM, 2025, p. 22)

Based on the provided information, it is unclear to the GN if the IEAC recommended this change in analysis frequency or if this was a recommendation from the Proponent. If the latter, the GN is seeking further clarification from the Proponent to justify the change in the frequency of camera analysis being completed and reported.

Camera Monitoring Program (Boston Area)

In the 2024 WMMP Compliance Report, the Proponent states,

“Twenty-nine wildlife cameras were previously deployed in the Boston area (Figure 3.2-2) ... The cameras have collected baseline data since September 2017.... The Boston camera program (Figure 3.2-2) was discontinued in spring 2024. There is currently no planned construction in the Boston area, and no monitoring is required. Therefore, the cameras will be redeployed prior to the onset of any construction in the Boston area.” (AEM, 2025, p. 38)

With respect to wildlife cameras in the Boston area, the GN emphasizes the importance of maintaining up-to-date baseline information and ensuring that wildlife camera data is collected consistently throughout all phases of the Project. It is the Proponent’s responsibility to ensure adequate data has been collected to allow for the effective assessment of potential Project-related impacts on wildlife.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent:

1. Clarify the rationale for the change in frequency of wildlife camera analysis.
2. Ensure the continued collection of wildlife camera data in the Boston area.