



# CIRNAC Comments to NIRB Re: Agnico Eagle Mine's Doris North Gold Mine and Phase 2 Hope Bay Belt Project 2025 Annual Report



Nunavut Regional Office  
918 Nunavut Drive  
Iqaluit, NU, X0A 3H0

Your file - Votre référence  
05MN047  
Our file - Notre référence  
GCdocs # 126575826

June 22, 2026

Keith Morrison  
Manager, Project Monitoring  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU, X0B 0C0  
Via electronic mail to: [info@nirb.ca](mailto:info@nirb.ca)

Dear Keith Morrison,

**Re: Comment Request for Agnico Eagle's Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project 2025 Annual Report**

On May 5, 2026, the Nunavut Impact Review Board (NIRB) requested parties to review and provide comments on Agnico Eagle Mines Limited's (AEM) Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project 2025 Annual Report for effects and compliance monitoring, pursuant to Section 12.7 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty The Queen in Right of Canada (Nunavut Agreement)* and the *Project Certificate No's 003 and 009*.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has conducted a review of the 2025 Annual Report and related documents in areas under its mandate and jurisdiction pertaining to effects and compliance monitoring. On this basis, CIRNAC would like to provide the comments below for NIRB's consideration.

CIRNAC appreciates the opportunity to review AEM's Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project Annual Report and looks forward to working with NIRB and AEM for future reviews of this project. Should you have any questions, please do not hesitate to contact Alex Chaikine by email at [alexandre.chaikine@rcaanc-cirnac.gc.ca](mailto:alexandre.chaikine@rcaanc-cirnac.gc.ca) or David Abernethy by email at [david.abernethy@rcaanc-cirnac.gc.ca](mailto:david.abernethy@rcaanc-cirnac.gc.ca)

Sincerely,



Richard Bingley  
Manager, Impact Assessment



**1. Effects Monitoring**

CIRNAC reviewed the 2025 Annual Report to assess valued components under its mandate for measurable effects against the potential impacts, predicted from the proposed development and operations of the Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project. This assessment takes into account AEM’s respective Final Environmental Impact Statements (FEIS), previous years’ monitoring reports, and the requirements included in the Project Certificates (as amended). This assessment considered the following:

- a. Whether the conclusions reached by AEM in the 2025 Annual Report are valid; and**
- b. Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.**

CIRNAC has identified information under its mandate and jurisdiction that invalidates the conclusions reached by AEM in its 2025 Annual Report.

Comment #1 Effluent Water Treatment Plant, Comment #2 Effluent discharges from the Madrid and Boston Mines, Comment #3 Reportable Spill Detailed Reports, Comment #4 North Dam Cooling System, Comment #5 Community Involvement Plan C from CIRNAC review of 2024 Annual Report have been addressed by AEM.

Additionally, CIRNAC has identified information that warrants further clarification and has provided the NIRB and AEM with the following comments for consideration.

Comment Number:	CIRNAC #1 NEW
Subject:	Management Plan Amendments
Reference:	<ul style="list-style-type: none"> <li>Hope Bay Project 2025 Nunavut Impact Review Board Annual Report – Main Report</li> <li>Hope Bay Mine Care and Maintenance Plan (Version 4)</li> </ul>
Issue/Rationale:	<p>CIRNAC notes that revisions incorporated into the revised Care and Maintenance Plan (Version 4) correspond to activities that are proposed as part of AEM’s ongoing Water Licence Amendment application associated with the potential restart and expansion of operations at Hope Bay. These include, but are not limited to, references to new infrastructure development, upgrades to site facilities, and modifications to water and waste management systems.</p> <p>The proposed Water Licence Amendment application and associated operational changes have not yet been approved through the applicable regulatory processes. Incorporation of proposed future activities into an active management plan prior to regulatory authorization creates uncertainty regarding which activities are approved under existing authorizations versus those that remain subject to future regulatory review and approval.</p>
Recommendation to Address Issues:	<p>CIRNAC recommends that AEM:</p> <ul style="list-style-type: none"> <li>a) Clarify which components of the revised Care and Maintenance Plan correspond to currently authorized activities versus activities proposed under the January 2026 Water Licence Amendment application;</li> <li>b) Explain the rationale for incorporating proposed future operational activities into the active Care and Maintenance Plan prior to regulatory approval;</li> <li>c) Confirm whether implementation of any activities described in the revised Care and Maintenance Plan remains contingent upon future regulatory approvals.</li> </ul>



Comment Number:	CIRNAC #2 NEW
Subject:	EEM Interpretive Findings
Reference:	<ul style="list-style-type: none"> <li>• Hope Bay Project 2025 Nunavut Impact Review Board Annual Report – Main Report</li> <li>• 2025 Aquatic Effects Monitoring Program Annual Report</li> <li>• Metal and Diamond Mining Effluent Regulations (MDMER) Environmental Effects Monitoring Program</li> <li>• NIRB Project Certificate No. 9, T&amp;C 51</li> </ul>
Issue/Rationale:	<p>The 2025 Annual Report indicates that the Phase 2 Marine Environmental Effects Monitoring (EEM) Interpretive Report was submitted to Environment and Climate Change Canada (ECCC) in January 2026. However, the interpretive report itself, or a summary of its conclusions, was not included in the Annual Report materials submitted to NIRB.</p> <p>The EEM Interpretive Report represents a key line of evidence for evaluating whether Project-related effluent discharges are resulting in measurable effects within the Roberts Bay marine receiving environment. While the Annual Report includes routine compliance monitoring information and confirms that discharge monitoring requirements under the MDMER were completed, the absence of the EEM interpretive conclusions limits the ability of reviewers to independently assess whether the Project is resulting in adverse marine environmental effects.</p>
Recommendation to Address Issues:	<p>CIRNAC recommends that AEM:</p> <ol style="list-style-type: none"> <li>Provide the Phase 2 Marine EEM Interpretive Report that was submitted to ECCC to the NIRB;</li> <li>Summarize the key conclusions of the EEM study, including whether Project-related effects were identified in the marine receiving environment;</li> <li>Indicate whether the study triggered any Investigation of Cause or follow-up requirements under the MDMER EEM framework;</li> </ol>

Comment Number:	CIRNAC #3 NEW
Subject:	Non-Compliant Water within the Boston Fuel Storage Facility
Reference:	<ul style="list-style-type: none"> <li>• Hope Bay Project 2025 Nunavut Impact Review Board Annual Report – Main Report</li> <li>• Water Licence 2BB-BOS1727</li> <li>• NIRB Project Certificate No. 9, T&amp;C 52</li> </ul>
Issue/Rationale:	<p>The 2025 Annual Report indicates that water contained within the Boston Fuel Storage Facility did not meet the discharge criteria outlined in Part D, Item 19 of Water Licence 2BB-BOS1727 and therefore was not discharged. However, limited information was provided regarding the nature of the non-compliance, the source of contamination, or the management measures implemented to address the issue.</p> <p>Additional information regarding the characterization, management, and</p>



Comment Number:	CIRNAC #3 NEW
	disposition of the non-compliant water would assist CIRNAC in evaluating the effectiveness of the associated containment and management systems and determining whether there is potential for environmental impact associated with the Boston fuel storage area.
Recommendation to Address Issues:	<p>CIRNAC recommends that AEM:</p> <ol style="list-style-type: none"> <li>Describe the nature of the non-compliance associated with the water stored within the Boston Fuel Storage Facility.</li> <li>Identify the likely source(s) and cause(s) of the contamination.</li> <li>Summarize the mitigation and management measures implemented in response to the issue.</li> <li>Confirm whether any contaminated water was released to the environment.</li> <li>Describe the current status and final disposition pathway for the non-compliant water.</li> </ol>

Comment Number:	CIRNAC #4 NEW
Subject:	Progressive Reclamation Reporting
Reference:	<ul style="list-style-type: none"> <li>Project Certificate No. 003 – Appendix D</li> <li>Hope Bay Project 2025 Nunavut Impact Review Board Annual Report – Main Report</li> <li>Appendix E.1 – Hope Bay Mine Care and Maintenance Plan (Version 4)</li> </ul>
Issue/Rationale:	<p>Appendix D of Project Certificate No. 003 requires the Annual Report to include “a summary of activities undertaken for the year, including any progressive reclamation work undertaken.” While the 2025 Annual Report discusses ongoing maintenance activities, future reclamation concepts, and limited infrastructure decommissioning activities, CIRNAC was unable to identify detailed information describing substantive progressive reclamation completed during the 2025 reporting period.</p> <p>Of particular importance, the submission contains minimal information regarding progressive reclamation measures associated with tailings and waste rock facilities, which represent the dominant long-term environmental liabilities associated with the Hope Bay Project. While the report references future reclamation concepts such as cover placement and underground backfilling opportunities, it remains unclear what measurable reduction in long-term environmental liabilities was achieved through progressive reclamation activities completed in 2025 or prior years.</p> <p>Additional reporting clarity would assist CIRNAC in evaluating ongoing progress toward closure and reduction of long-term environmental risk.</p>
Recommendation to Address Issues:	<p>CIRNAC recommends that AEM:</p> <ol style="list-style-type: none"> <li>Provide a summary of substantive progressive reclamation activities completed during 2025.</li> </ol>



Comment Number:	CIRNAC #4 NEW
	<ul style="list-style-type: none"><li>b) Identify any progressive reclamation measures completed specifically with respect to tailings and waste rock management facilities.</li><li>c) Quantify, where possible, the extent to which progressive reclamation activities reduced long-term environmental liabilities or closure risks.</li><li>d) Include supporting inspection reports, photographs and/or figures documenting progressive reclamation activities in future annual reports, where appropriate.</li></ul>



## 2. **Compliance Monitoring**

CIRNAC has a broad mandate for the co-management of water resources and the management of Crown land in Nunavut under the following applicable acts and regulations:

- The *Department of Crown-Indigenous Relations and Northern Affairs Act*;
- The *Nunavut Land Claims Agreement Act* and the Nunavut Agreement;
- The *Arctic Waters Pollution Prevention Act and Regulations*;
- The *Nunavut Waters and Nunavut Surface Rights Tribunal Act and Regulations*; and
- The *Territorial Lands Act and Regulations*.

CIRNAC's monitoring responsibilities are fulfilled by reviewing and providing expert advice and comments to the NIRB and the Nunavut Water Board (NWB) on Annual Reports and conducting site inspections. CIRNAC Inspectors conduct site inspections to ensure project activities are compliant with Terms and Conditions in any water licence(s), land use authorization(s), such as land use permits and leases, and the Project Certificate. Inspectors prepare site inspection reports with observations and recommendations, and they have the authority to issue and enforce directions with a timeline for implementing corrective measures.

The NIRB requested that regulatory authorities provide comments and/or information associated with their mandates and jurisdictions with respect to the following:

- a. ***Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically:***
  - i. ***Identify the Terms and Conditions from the Project Certificate which have been incorporated into any permits, certificates, licenses or other approvals issued for the Project, where applicable, and report annually to the NIRB on the status of those incorporated Terms and Conditions.***

CIRNAC issued the following Crown Land Leases for AEM's Doris North Gold Mine Project and Phase 2 Hope Bay Belt Projects, respectively:

- In 2007, CIRNAC issued lease 77A/3-1-2 for the construction and operation of the Roberts Bay Jetty and Marine Outfall Berm; expired 2017. In 2017, lease 77A/3-1-7 was renewed for a thirty year term.
- In 2018, CIRNAC issued lease 77A/3-3-2 for the Marine Outfall pipe, for a thirty year term.

CIRNAC has reviewed the Type A and Type B Water Licences associated with the Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project with respect to Project Certificate No. 003; Amendment 002, and Project Certificate No. 009, and has included a concordance table (Appendix A) showing how the Terms and Conditions have been integrated into the Water Licences and CIRNAC land leases.

- ii. ***A summary of any inspections conducted during the 2025 reporting period and the results of these inspections;***

In 2025, the project's activities and monitoring were conducted under the following Water Licences:

- Type A Water Licence 2AM-DOH1335
- Type A Water Licence 2AM-BOS1835
- Type B Water Licence 2BB-MAE1727
- Type B Water Licence 2BB-BOS1727
- Type B Water Licence 2BE-HOP2232



No inspection was completed by CIRNAC in 2025. CIRNAC inspectors started an inspection on June 03, 2026 to ensure that the licensee was in compliance with the Term and Conditions of the Water Licences 2AM-DOH1335, 2BB-BOS1727 and 2BE-HOP2232 and Land Lease numbers 77A/3-1-7 and 77A/3-3-2.

***iii. A summary of AEM's compliance status with regard to authorizations that have been issued for the Project.***

Inspections since 2023 have revealed ongoing challenges that have been addressed and acknowledged by AEM.

CIRNAC will continue to work with AEM to ensure compliance with all water licence and land use requirements associated with the Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project.



**Appendix A: Project Certificate Terms and Conditions incorporated into any permits, certificates, licences or other approvals issued for the Project**

<b>NIRB Project Certificate No. 003; Amendment 002, Term &amp; Conditions</b>		<b>Implemented in Licences or Permits</b>
6	The Proponent shall report by January 1st of each calendar year to NIRB on its development plan for future phases of the Hope Bay Belt, including identifying development plans that may affect the selection of TIA as the preferred alternative for tailings management.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Items 6, and 14)</li> </ul>
10	Should water from the TIA be discharged into Doris Creek, the Proponent shall ensure that monitoring of Tail Lake and Doris Creek water quality occurs, above and below the waterfall, and is verified by an independent, third party laboratory. The Proponent must provide copies of the results directly to the NIRB and NIRB's Monitoring Officer.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1323 Amendment 003, Part J (Items 3, 8, and 9)</li> <li>▪ Water Licence 2AM-DOH1323 Amendment 003, Part K (Item 2)</li> </ul>
13	The Proponent shall collect additional water quality data for the 2006 field season and incorporate it into a revised water quality model to be submitted to the NWB as part of the water licence application. To ensure the protection of the receiving environment at the point of discharge, the Proponent will meet discharge criteria: a. Where discharge is to the freshwater environment, on a site specific basis set by the NWB where possible and as set by the Metal Mining Effluent Regulations (MMER); and, b. Where discharge is to Roberts Bay, discharge criteria set by the MMER and the Arctic Waters Pollution Prevention Act.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part G (Items 3, 23, 24, 27, 28, 29, 30, 32)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Item 8)</li> </ul>
15	The Proponent shall not permit the water discharged into Doris Creek to exceed the criteria set by the NWB.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part G (Items 28, 29 and 30)</li> <li>▪ Land Lease 77A/3-1-7, 77A/3-2-2, Part 32</li> </ul>
16	The Proponent shall take all reasonable steps to prevent any discharge that is not in compliance with applicable regulatory approvals or requirements. If such a situation is encountered, the Proponent shall take immediate action to address the noncompliant discharge.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Water Licence Amendment 003, Part G (Items 28, 29, 30, 32)</li> <li>▪ Water Licence 2AM-DOH1323 Amendment 003, Part J (Item 8)</li> <li>▪ Land Lease 77A/3-1-7, 77A/3-2-2, Part 32</li> </ul>
18	The Proponent shall submit to the NWB, as part of the water licence application, a program detailing the methodology for testing quarried rock for acid generation and metal leaching potential. The sampling, testing, and analysis must be done by a professional geologist registered in Nunavut.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Items 9 and 10)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part G (Items 14 and 15)</li> </ul>



<b>NIRB Project Certificate No. 003; Amendment 002, Term &amp; Conditions</b>		<b>Implemented in Licences or Permits</b>
19	The Proponent shall install thermistor cables and temperature loggers in the jetty foundation as well as the new jetty foundation. The Proponent shall monitor the effects of the jetty on shallow water permafrost through operations, until such time as the NIRB determines that such monitoring is no longer necessary, and report the results of the monitoring collection to NIRB's Monitoring Officer.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Items 14, 18, and 19)</li> <li>▪ Land Lease 77A/3-1-7, 77A/3-2-2, Part 41.1</li> </ul>
31	The Proponent shall maintain a complete Closure and Reclamation Plan on file with the NWB prepared in accordance with requirements of the NWB and other regulators.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part L (Items 5, 6, and 7)</li> </ul>
32	Prior to the commencement of operation the Proponent shall have a complete Environment, Health and Safety Management System in place which includes the following: <ul style="list-style-type: none"> <li>▪ Wildlife Mitigation and Monitoring Plan;</li> <li>▪ Environmental Protection Plan;</li> <li>▪ Emergency Response and Spill Contingency Plan;</li> <li>▪ Occupational Health and Safety Plan;</li> <li>▪ Human Resources Plan;</li> <li>▪ Community Relations Plan;</li> <li>▪ Monitoring and Follow-up Plan;</li> <li>and</li> <li>▪ Auditing and Continuous Improvement Plan.</li> </ul> When complete, these Plans shall be forwarded to the NIRB's Monitoring Officer.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I</li> <li>▪ Land Lease 77A/3-1-7, 77A/3-2-2, Part 25-31</li> <li>▪ Land Lease 77A/3-1-7, 77A/3-2-2, Part 35</li> </ul>
33	The Proponent shall ensure spill kits are at hand at the Roberts Bay oil handling facility at all times, and that appropriate containment measures are used to prevent, contain and respond to a spill in accordance with the Most recent version of the Oil Pollution Emergency Plan and Oil Pollution Prevention Plan reviewed by Transport Canada.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part G (Items 10, 11, and 12)</li> <li>▪ Land Lease 77A/3-1-7, 77A/3-2-2, Part 37</li> </ul>
36	The Proponent shall continue year-round monitoring and recording of Doris Lake water levels during construction and operations. This will allow for detection of actual Doris Lake draw down below the sill level; computation of the amount of drawdown, quantification of the project impact, and implementation of adaptive mitigation and management measures as appropriate.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part G (Item 34C)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Items 3, and 11)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Item 6B)</li> </ul>
37	The Proponent shall develop and submit a detailed Groundwater Management Plan for review during the water licensing process and to the NIRB as part of the plans available on the Doris North project. The plan shall acknowledge uncertainties pertaining to predictions of groundwater quantity and quality and inform the Groundwater Management Plan. Indigenous and Northern Affairs Canada should be consulted with respect to the contents of the Plan and any required mitigation measures.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 6I)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part G (Item 3)</li> </ul>
39	At least six (6) months prior to operation of the effluent pipeline and diffuser system, the Proponent shall conduct and submit to the Board a hazard and operability study of the pipeline and marine outfall system as part of the land authorization process	<ul style="list-style-type: none"> <li>• Land Lease 77A/3-23-2, Clause 42</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
1	The Proponent shall maintain an Air Quality Management Plan that addresses the following areas/issues: a) regular stack testing of incinerators to demonstrate emissions are within levels predicted or within applicable guidelines or standards; b) continuous NO <sub>2</sub> monitoring and demonstration that NO <sub>2</sub> emissions do not exceed levels impact predictions nor relevant guidelines; and c) implementation of dust suppression measures and demonstration that dustfall and concentrations of suspended particulate matter are within levels predicted or committed to, and within levels or limits established by applicable guidelines and regulations.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part E (Item 12)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part F (Items 1 and 6)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule D (Item 2M)</li> </ul>
3	The Proponent shall maintain a Mine Closure and Reclamation Plan that addresses the following areas/issues: <p>a) adaptive management approaches for monitoring and mitigation measures to ensure long-term containment of the Tailings Storage Facility and Waste Rock Storage Areas;</p> <p>b) measures to maintain the integrity of the groundwater quality within and adjacent to the Project; and</p> <p>c) estimates of the approximate fill time for the mine pits.</p>	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Items 1, 2, 3, and 8)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Items 4, 5, and 7)</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
5	<p>The Proponent shall maintain a stand-alone Acid Rock Drainage and Metal Leaching Management Plan (or equivalent as may be specified under the Type "A" Water Licence) that includes the following information: a) procedures for inspection and sampling/testing of waste rock, ore, tailings storage facilities, and quarry source material; b) thermal monitoring of waste rock and tailings storage facilities, including tailings management areas; c) seepage management and monitoring; d) a schedule for reporting of results and periodic updating of predictions for seepage water quality; e) planning for optimal cover conditions above-ground mine- and quarry-related material storage facilities; f) contingency measures that may be implemented if required, including measures to address the potential for leaching of arsenic from waste rock and ore stockpiles, and tailings under neutral pH conditions; g) plans for comparing monitoring results from receiving waters to model predictions; and h) identification of thresholds that will trigger specific management actions, including active water treatment, if trends analyses indicate water quality objectives may be exceeded.</p>	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Items 2, 8, 11, 18, and 19)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Item 2)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule D (Items 1c and 2e)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part F (Items 1, 14, 18, 19[b, d, e, f, g, h, i, k], 20b, 21, and 22)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Items 3, 7, 8, 9, 10, 11, 12, 14, 16, 17, and 19)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule I</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Items 7 and 8)</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
6	In consultation with applicable regulatory agencies and experts such as Natural Resources Canada, the Proponent shall undertake additional site- specific geotechnical investigations, permafrost monitoring, mapping and thermal analysis to: a) document permafrost conditions, including seasonal thaw, amount of ground ice; b) inform the detailed design of project infrastructure, including foundations, such as water management structures, mine site and haul roads, waste rock storage facilities, and tailings storage facilities, including dam structures associated with the Doris North Tailings Impoundment Area; c) inform updates/revisions to management plans related to waste rock, ore, and tailings storage facilities, including adaptive management strategies with clear thresholds for implementation to minimize the potential for impacts from these facilities; and d) ensure the integrity of project infrastructure and components, including tailings cover, is maintained post-closure.	<ul style="list-style-type: none"> <li>• Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>• Water Licence 2AM-DOH1335 Amendment 003, Part D (Item 6)</li> <li>• Water Licence 2AM-DOH1335 Amendment 003, Schedule D (Items 1e and 2l)</li> <li>• Water Licence 2AM-DOH1335 Amendment 003, Part E (Item 10)</li> <li>• Water Licence 2AM-DOH1335 Amendment 003, Part F (Items 4 and 19c)</li> <li>• Water Licence 2AM-DOH1335 Amendment 003, Part G (Item 3g)</li> <li>• Water Licence 2AM-DOH1335 Amendment 003, Part I (Items 9 and 10)</li> <li>• Water Licence 2AM-DOH1335 Amendment 003, Part J (Items 13 and 14)</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
7	The Proponent shall maintain an Erosion Management Plan designed to prevent or minimize erosion and its resulting effects from project-related land disturbance. The Plan shall include the following: a) identification of specific project activities that require erosion control; b) description of associated erosion issues; and c) specific measures to prevent or minimize erosion.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Item 6)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule D (Items 1e and 2l)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part E (Item 10)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part F (Items 4 and 19c)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part G (Item 3g)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Items 9 and 10)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Items 13 and 14)</li> </ul>
8	As part of the Mine Closure and Reclamation Plan (or equivalent), the Proponent shall develop and implement a program to progressively reclaim disturbed areas within the project footprint, with an emphasis on restoring the natural aesthetics of the area through re-contouring to the extent practicable. Acceptability of reclamation efforts should be confirmed through the Proponent's public engagement with local communities and discussion of local aesthetic values (e.g., acceptability of the topography and landscape of the project areas following progressive reclamation efforts). Progressive reclamation efforts should also demonstrate consideration for the feasibility of topsoil/organic matter salvage to promote revegetation.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Item 12)</li> </ul>
9	The Proponent shall implement a Thermal Monitoring Plan to identify potential changes in talik distribution and flow paths that may result from the development of project infrastructure, including underground workings, tailings storage facilities, and water impoundment areas.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Items 7, 8, 9 and 10)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule I</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
10	<p>Subject to potential receipt of more detailed direction from the Nunavut Water Board, the Proponent shall: a) monitor the effects of project activities and infrastructure on surface water quality conditions; b) ensure the monitoring data is sufficient to compare the impact predictions made for the Project with actual monitoring results; c) ensure that the sampling locations and frequency of monitoring is consistent with and reflects the requirements of the Aquatic Effects Monitoring Plan, and Water Management Plan; and d) on an annual basis, compare monitoring results with the impact assessment predictions in the FEIS and will identify any significant discrepancies between impact predictions and monitoring results.</p>	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Items 8 and 9)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part E (Items 2 and 11)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part F (Items 5b, 18a,b, 22, and 24)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Items 1, 12, 13, 14, 15 and 19)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Item 4)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule I</li> </ul>
11	<p>The Proponent shall, reflecting any direction from responsible authorities, maintain an Aquatic Effects Monitoring Program (AEMP) designed to appropriately characterize the receiving environment and ensure that adequate data is available to assess impact predictions made for the Project and prevent adverse impacts from occurring. The AEMP should include measures to:</p> <p>a) determine the short and long-term effects in the aquatic environment resulting from the Project;</p> <p>b) evaluate the accuracy of Project effect predictions;</p> <p>c) assess the effectiveness of mitigation and management measures on Project effects;</p> <p>d) identify additional mitigation measures to avert or reduce environmental effects due to Project activities;</p> <p>e) comply with Metal and Diamond Mining Effluent Regulations requirements, should an Environmental Effects Monitoring program be triggered;</p> <p>f) reflect site-specific water quality conditions;</p> <p>g) include details comparing the watershed features from the Aimaokatalok, Windy, and Doris watersheds to the reference watersheds (Reference A, Reference B, Reference C and Reference D lakes and streams); and</p> <p>h) evaluate the mixing and non-mixing portion of the pit.</p>	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Items 1, 7, 9, 17 and 18)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Items 1, 3, 6, 14, 17, and 19)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule I</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
12	Unless otherwise authorized, the Proponent shall maintain an appropriate setback distance between project quarries and borrow pits from fish-bearing or permanent water bodies as required to prevent acid rock drainage or metal leaching into such Water bodies and to mitigate the potential for impacts from runoff/sedimentation associated with project quarries and borrow pits	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Item 18)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part F (Item 1)</li> </ul>
13	The Proponent shall ensure that all project infrastructure in watercourses are designed and constructed in such a manner that they do not unduly prevent or limit the movement of water or fish species in fish bearing streams and rivers, unless otherwise authorized by Fisheries and Oceans Canada.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1323 Amendment 003, Part D (Items 16 and 17)</li> </ul>
15	The Proponent shall implement all applicable Fisheries and Oceans Canada best management practices to avoid and mitigate serious harm to fish as a result of the construction, operations, and decommissioning of winter ice roads, and from under ice water withdrawals. This includes adequately screening the water intake pipes to prevent impingement and entrainment of fish.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Item 16)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part E (Item 8)</li> </ul>
16	The Proponent shall implement all applicable Fisheries and Oceans Canada best management practices to avoid and mitigate serious harm to fish as a result of water crossing construction, operations, and decommissioning for all fish bearing water crossings.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Items 16 and 17)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Item 13)</li> </ul>
18	The Proponent shall ensure that the progressive reclamation efforts outlined in its Mine Closure and Reclamation Plan or equivalent encourage recolonization by native plant species. These efforts are expected to be informed by revegetation trials in the Project area and must include monitoring protocols over sufficient timeframes to measure success and ensure invasive plant species have not established.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Items 12 and 16)</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
19	The Proponent shall maintain a Road Management Plan which includes: a) maintenance of traffic logs and traffic counters along the all-weather road between the Doris-Madrid mine sites and Madrid-Boston mine sites. Where traffic levels exceed levels predicted for the Project, the Proponent shall develop and implement appropriate enhancements to its wildlife protection measures; b) information regarding the road design, safety barriers, berms and features designed to ensure safe wildlife movement; c) description of safety protocols and enforcement by the Proponent, including restrictions imposed during periods of low visibility, and training provided to road users; and d) program to monitor snow bank heights along Project roads to ensure they do not pose a barrier to movement of wildlife or other land users.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Items 1, 10, 11 and 21)</li> </ul>
43	The Proponent should ensure that the development of all project monitoring plans, associated reporting and updates are undertaken with active engagement of Kitikmeot communities, land users, and harvesters. The Proponent should work with the Kitikmeot Inuit Association, the local Hunters and Trappers Organizations and the Kitikmeot Socio-Economic Monitoring Committee to report on the collection and integration of Inuit Qaujimaningit through its monitoring programs for the Project.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Item 14)</li> </ul>
44	The Proponent is strongly encouraged to consult with outfitting and guiding businesses that operate in or travel through the regional study area regarding whether project infrastructure or activities is adversely affecting their use and experience of the surrounding environment	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Item 14)</li> </ul>
49	The Proponent shall maintain a current Community Involvement Plan which reflects relevant stakeholders with respect to the Project. a) Records of communication and engagement undertaken by the Proponent with stakeholders, including potentially impacted communities, are to be maintained throughout the life of the Project with outcomes reflected in this Plan.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Item 14)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part J (Item 18)</li> </ul>



<b>NIRB Project Certificate No. 009, Term &amp; Conditions</b>		<b>Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003</b>
51	The Proponent shall conduct additional studies prior to and during operations as part of its freshwater and marine aquatic effects analyses to ensure that toxic trace elements concentrations anticipated to increase in the aquatic and marine environments during operation (and potentially accumulating in fish tissue) do not exceed regulatory requirements. The results of these studies should inform the Proponent's assessment of potential risks from consumption of fish, using Health Canada's hazard quotients as a descriptive tool.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Items 1, 2, 3, 4, 12, 13, 14, 15, 16, 17 and 19)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule I</li> </ul>
52	The Proponent shall ensure that areas used to store fuel or hazardous materials include sufficient secondary containment and that all oil handling facilities have the required Oil Pollution Emergency Plan (OPEP) in place. The OPEP or other emergency response plans applicable to fuel or hazardous material storage areas are expected to include, as a minimum, the following: a) information on the placement of spill prevention and response equipment as necessary to initiate rapid response during an emergency; b) an up to date listing of critical TMAC and government spill response contacts, and a list of authorised emergency response personnel; c) an up to date listing of emergency response training conducted by TMAC's emergency response personnel; d) easily accessible and up to date spill report forms; and e) a listing of community organizations that would be contacted to inform traditional land users of any spills or response actions implemented to ensure continued public safety. The Proponent shall also demonstrate that the provisions of the OPEP or other applicable emergency response plans associated with the fuel tank farm at Roberts Bay are coordinated with the individual shipboard OPEPs required for vessels servicing the Project, and that the Shipping Management Plan addresses how response procedures between ship and shore will be coordinated.	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Items 11, 13 and 15)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part H (Items 1, 7, 8, 9 10, and 11)</li> </ul>



NIRB Project Certificate No. 009, Term & Conditions		Implemented in NWB Water Type 'A' Water Licence No. 2AM-DOH1335 Amendment 003
53	<p>The Proponent shall implement a monitoring and mitigation program for the tailings pipelines that includes the following: a) regular inspections to assess the stability of the tailings pipeline and land within the footprint of this infrastructure; b) early warning system(s) to identify a pipeline breach; c) measures to respond to and mitigate any accidental spills of tailings from the d) pipeline; and e) adaptive management to address unanticipated changes to land within the footprint of the tailings pipeline to ensure that the integrity of this infrastructure is maintained for the life of the Project.</p>	<ul style="list-style-type: none"> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part B (Item 13)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part D (Item 21)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part F (Items 1 and 19)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Part I (Item 9)</li> <li>▪ Water Licence 2AM-DOH1335 Amendment 003, Schedule B (Item 5)</li> </ul>

