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June 19, 2026

Sent VIA Email: info@nirb.ca

NIRB File #: 05MN047 & 12MN001

Re: **Comment Request for Agnico Eagle's Hope Bay Projects 2025 Annual Report**

Hello Keith,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to review Agnico Eagle Mines Ltd.'s 2025 Annual Report for the Doris North and Phase 2 Hope Bay Belt Projects, NIRB File #s 05MN047 and 12MN001.

The GN has reviewed the annual report materials and is pleased to provide the attached comments and completed GN worksheet for the Board's consideration. The GN's comments focus on the adequacy of information needed to assess wildlife mitigation, monitoring, and reporting for the 2025 reporting period, including the Wildlife Mitigation and Monitoring Plan, wildlife camera program, caribou monitoring, snowbank and snow-track monitoring, grizzly bear and wolverine monitoring, blast-related noise and behaviour monitoring, road traffic, and aircraft reporting.

The GN appreciates participating in the review of this project through NIRB's monitoring process. Should there be any concerns or need for follow-up, please feel free to contact me at jfbuller@gov.nu.ca.

Thank you,

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN AR 01	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 003
	  ○ Terms and Conditions 25–27
	• Project Certificate No. 009
	  ○ Term and Condition 19
	  ○ Commitment 46 (2018)

Responsible Party	No
References	• Agnico Eagle Mines Limited – Hope Bay. Wildlife Mitigation and Monitoring Plan (April 2025) • Agnico Eagle Mines. *Agnico Eagle advances Hope Bay redevelopment with long-term investments for Nunavut communities*. https://aemnunavut.ca/agnico-eagle-advances-hope-bay-redevelopment-with-long-term-investments-for-nunavut-communities/ (May 2026)

IDENTIFICATION OF ISSUE

In recent years, the Government of Nunavut (GN) has had limited involvement in the updating/refinement of the Hope Bay/Doris North Project's (Project) Wildlife Mitigation and Monitoring Plan (WMMP). However, the GN considers it important to review the WMMP before the Project resumes production, which is anticipated in 2030.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The WMMP and the Project's Terms and Conditions and commitments clearly state that the WMMP is intended to be developed and refined collaboratively with the GN and other entities. For example, Commitment 46 states,

> "The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
>
> - The Project's effects on caribou movements will be monitored at a local scale using behavioral observations from height-of-land surveys and snow track study.
> - The design of these monitoring programs will be developed in consultation with the Government of Nunavut and the Inuit Environmental Advisory

> Committee, will use methods supported by peer reviewed literature and will consider statistical power…" (NIRB, 2018)

Additionally, Term and Condition 19 discusses the requirement for periodic updates to the WMMP. For example, the commentary states that Agnico Eagle (Proponent) is required to adopt a process "…in collaboration with the parties, to ensure periodic review of the WMMP occurs and updates to the WMMP are undertaken when the review identifies that reviews are necessary". (NIRB, 2018)

However, the GN has not been engaged by the Proponent in the review of this document since the 2016–2017 period (Agnico Eagle, 2025, p. 5). While the Proponent references plans to develop a height-of-land and snow-track survey program with the GN in the WMMP, the GN notes that no timeline is provided (Agnico Eagle, 2026, p. 21).

Additionally, Term and Condition 27 states,

> "The Proponent shall update and revise the Wildlife Mitigation and Monitoring Plan (WMMP) to reflect Project terms and conditions and shall revise the Wildlife Mitigation and Monitoring Plan and submit to the Nunavut Impact Review Board (NIRB) for review. The NIRB may consult with relevant Government departments and the Nunavut Wildlife Management Board prior to approving the revised WMMP. The revised WMMP must be submitted within three (3) months after the updated Project Certificate is issued. <u>The Proponent must also submit an updated plan on an annual basis which much also be approved by NIRB.</u>" (NIRB, 2016)

<u>Emphasis added</u>

However, the 'Revisions' section of the WMMP does not indicate annual updates to the WMMP or state NIRB's involvement in this matter.

Given the reasons outlined above, and in light of the upcoming redevelopment of the Project, with production planned for 2030 (Agnico Eagle, 2026), the GN requests an opportunity to review the Proponent's WMMP. These factors underscore the need for a dedicated review to ensure that mitigation and monitoring measures remain current, appropriate, and aligned with the Project's redevelopment.

REQUEST(S)/RECOMMENDATION(S)

In light of the Proponent's recent announcement to redevelop the Project, the GN requests that the NIRB direct the Proponent to initiate a review of the WMMP and seek written feedback from the GN Department of Environment, given its mandate for wildlife protection.

Note: Any comments provided through this annual report process are not intended to limit the GN's future review of the WMMP.

GN AR 02	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 003
	  ○ Terms and Conditions 25–27
	• Project Certificate No. 009
	  ○ Term and Condition 19
	  ○ Commitment 48 (2018)

Responsible Party	No
References	• Agnico Eagle Mines. Hope Bay 2025 Annual Report: Appendix C2: Hope Bay Mine 2025 Wildlife Mitigation and Monitoring Program Compliance Report (April 2026) • Agnico Eagle Mines. Hope Bay 2024 Annual Report: Appendix F.5: Wildlife Mitigation and Monitoring Plan (April 2025)

IDENTIFICATION OF ISSUE

The GN requires additional information/explanation regarding camera locations as featured in the 2025 Wildlife Mitigation and Monitoring Program Compliance Report (Wildlife Report) and the WMMP.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

<u>Camera Placement – Wildlife Habitat</u>
The GN notes that the 2025 Wildlife Report and associated WMMP do not clearly explain wildlife camera placement, intended to monitor the wildlife Zone of Influence (e.g., section 3.1.2.2; Agnico Eagle, 2025), as it relates to Valued Ecosystem Component (VEC) target species or to areas of seasonal importance. For example, Figure 3.2-1, as presented in the 2025 Wildlife Report, only portrays the wildlife camera locations and their camera monitoring zone without any additional wildlife range information.

<u>Camera Placement & Information – Roads</u>
The GN's understanding is that currently, the only cameras that collect data near the roads are:

- Camera 2 (Monitoring road crossing ramps) (Agnico Eagle, 2026, p. 3-15)
- Camera 18 (traffic volume) (Agnico Eagle, 2026, p 2-4)
- Camera 20 (Monitoring the under-road culvert) (Agnico Eagle, 2026, p. 3-15)

- Camera 27 (Monitoring the under-road culvert) (Agnico Eagle, 2026, p. 3-15)
- Camera 35 (Monitoring road crossing ramps/traffic volume) (Agnico Eagle, 2026, p. 3-15)

The GN notes that, based on Figure 3.2-1 of the 2025 Wildlife Report, spur roads branching from the Doris–Madrid road and the southern extension near Madrid do not appear to have road-camera coverage. The GN recognizes that some road construction occurred in 2025 (e.g., Figure 2.1-2). However, neither the 2025 Wildlife Report nor the WMMP indicates whether additional cameras are planned to improve coverage.

The GN is concerned that portions of the Project's road network lacking camera deployment may limit the ability to assess how the Project influences wildlife movement.

Ultimately, without this additional information, the GN remains concerned that the full effects of the Project on wildlife, particularly caribou, may not be fully understood. Camera deployment should provide sufficient spatial replication and ecological relevance to support a more quantitative assessment of changes in wildlife use and movement through the Project area.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent undertake the following:

1. Provide maps of seasonally important wildlife areas within the Regional Study Area (RSA) and overlay all camera locations, including attributes identifying target species and life-history relevance, to assess the camera network's ability to monitor impacts and support mitigation.
2. Using these maps, evaluate the number and placement of cameras along linear infrastructure within the RSA, with a methodological focus on detecting potential effects on wildlife use and movement, particularly for predators and caribou.
3. Clearly describe how camera program findings will inform mitigation measures, including the pathways through which observed effects will trigger adaptive management actions.

GN AR 03	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 003
	  ○ Terms and Conditions 25–27
	• Project Certificate No. 009
	  ○ Term and Condition 19 (2018)

Responsible Party	No
References	• Agnico Eagle Mines. Hope Bay 2025 Annual Report: Appendix C2: Hope Bay Mine 2025 Wildlife Mitigation and Monitoring Program Compliance Report (April 2026) • Agnico Eagle Mines. Hope Bay 2024 Annual Report: Appendix F.5: Wildlife Mitigation and Monitoring Plan (April 2025)

IDENTIFICATION OF ISSUE

With respect to wildlife camera data, the Proponent states that they classify caribou into herds using visual herd identifications. However, the 2025 Wildlife Report and WMMP do not detail specific methods involved. Because visual assessments are imperfect, the GN recommends strengthening identification by adding a standardized physical-traits checklist and periodic genetic ground-truthing (e.g., non-invasive scat analysis) to provide conclusive evidence that animals identified by cameras are correctly classified as either barren-ground or Dolphin Union caribou.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Section 3.4.2 of the 2025 Wildlife Report states,

> “Caribou are also identified by herd based on a request by the [Inuit Environment Advisory Committee] to understand potential changes in the presence of Dolphin and Union caribou on the mainland year-round. Caribou herd identification differentiates individuals belonging to the Beverly/Ahiak herd from individuals belonging to the Dolphin and Union herd.” (Agnico Eagle, 2026, p.3-7)

Section 3.4.2.3 of the 2025 Wildlife Report then states,

> “Caribou were classified by herd, which was determined based on the Mine’s Caribou Identification Guide developed via a caribou identification workshop with the IEAC. Caribou from each herd in the Mine area have distinct physical features

and can be identified to herd level with clear photos of the whole animal. Identifications were made by considering consecutive images taken of each caribou. Classification of caribou herd was completed by ERM staff trained to identify Beverly/Ahiak and Dolphin and Union individuals. Caribou detections with uncertain herd characteristics are provided to the IEAC for additional input." (Agnico Eagle, 2026, p. 3-9)

However, the 2025 Wildlife Report and WMMP do not detail specific methods of the Caribou Identification Guide.

Because visual assessments are imperfect, periodic ground-truthing tied to periods of overlap with the RSA is required. Visiting camera sites during those overlap periods to collect scat for genetic analysis is a feasible, non-invasive method to confirm herd identity and reduce the risk that misidentification skews assessments of mine and exploration effects.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent:

1. Append the 'Caribou Identification Guide' to the WMMP.
2. Implement periodic ground-truthing timed to overlap with the RSA and scheduled seasons of herd presence, including:
    a) Add genetic checks to the photo-based herd identification process to confirm that caribou identified in camera images are assigned to the correct herd.
    b) Use non-invasive scat DNA testing at or near camera or sighting locations to verify which herd the animals belong to.
    c) Describe the methods and report the genetic verification results in the WMMP and the 2025 Wildlife Report to show that barren-ground caribou can be reliably distinguished from Dolphin and Union caribou.

GN AR 04	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 003
	  ○ Terms and Conditions 25–27
	• Project Certificate 009
	  ○ Term and Condition 20
	  ○ Commitments 46 & 49

Responsible Party	• No: 20, 25–27 • Yes: 46 & 49
References	• Agnico Eagle Mines. Hope Bay 2025 Annual Report: Appendix C2: Hope Bay Mine 2025 Wildlife Mitigation and Monitoring Program Compliance Report (April 2026) • Agnico Eagle Mines. 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) • Agnico Eagle Mines. 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) • 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) • 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 (June 2025)

IDENTIFICATION OF ISSUE

The Proponent has still not provided the snowbank height monitoring information previously requested by GN in response to annual reports from 2023 and 2024. The GN notes that the Proponent committed to doing so during the 2023 Annual Report period.

Additionally, the GN has questions concerning the Project's snow-track survey.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Snow Bank Monitoring

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).

Yet, as noted by the GN, this information was not in the 2024 annual report materials (GN, 2025) or the 2025 annual report materials. However, the GN notes that the WMMP states, "Following consultation with the IEAC in July 2024, the snowbank height monitoring program has been discontinued." (Agnico Eagle, 2025, p. 21)

The GN maintains that snowbank height monitoring is important, as snowbanks could act as a barrier to wildlife movement, which can vary across the winter months from freeze-up to melt.

Snow Track Surveys

The GN notes that no snow track surveys are presented in the 2026 Wildlife Report. Instead, the WMMP states,

> "…Hope Bay will conduct local scale monitoring through height of land and snow track surveys. The design of these programs will be developed in consultation with the IEAC and GN DoE. Caribou behavioural observations will be recorded with particular focus on reaction to infrastructure that may alter caribou movements, such as roads.
>
> As discussed during consultation with the IEAC in July 2024, once Mine Operations resume, snow track surveys will be conducted along Mine roads twice per month during the winter. A detailed SOP will be developed in consultation with the IEAC and GN DoE. Additionally, a year of baseline surveys will be completed between Madrid and Boston prior to road construction." (Agnico Eagle, 2025, p. 21)

However, Commitment 46 states,

> "The snow track study will be designed to estimate the index of permeability of Project roads to caribou. These programs may be discontinued after definitive results are obtained or if statistical power cannot be achieved by means of reasonable sampling design and effort, as determined by NIRB." (NIRB, 2018)

It remains unclear to the GN regarding the NIRB's involvement in the Proponent's determination to discontinue the snow track surveys. In addition, the GN remains unclear about: a) the Proponent's plans for engagement with the GN regarding the development of the snow track survey program, and b) the status and timing of baseline survey collection before road construction.

REQUEST(S)/RECOMMENDATION(S)
The GN requests that the Proponent undertake the following: 1. Confirm that snowfall during the monitoring program (2020–2025) was within climate norms and averages. 2. Should snowbank monitoring resume: a) Provide seasonal snow-depth profiles across all linear infrastructure, measured as cross-sections extending at least 250 m perpendicular to each side of the structure to capture downwind accumulation patterns. b) Continue until a 5-year time series of snow depths is accumulated, averaged and discussed as to their potential impacts on wildlife in the area. 3. Provide plans for engagement with the GN concerning the snow track survey development. 4. Provide plans for baseline survey collection before road construction. The GN requests that the NIRB clarify what direction was given to the Proponent, and when, to discontinue the snow track surveys.

GN AR 05	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 003
	  ○ Terms and Conditions 22, 25–27
	• Project Certificate No. 009
	  ○ Term and Condition 19

Responsible Party	• No: 19, 25–27 • Yes: 22
References	• Agnico Eagle Mines. Hope Bay 2025 Annual Report: Appendix C2: Hope Bay Mine 2025 Wildlife Mitigation and Monitoring Program Compliance Report (April 2026) • Awan, M., M. Efford, J. Boulanger and K. G. Poole. 2023. Grizzly bear DNA mark-recapture sampling in the Western Kitikmeot Region of Nunavut, 2021. Department of Environment, Government of Nunavut. 57pp. • Awan, M., J. Boulanger, M. Efford, and K. G. Poole. 2025. Grizzly Bear DNA Mark-Recapture Sampling in the Western Kitikmeot Region of Nunavut, 2022-2023. Department of Environment, Government of Nunavut. 65pp. • Barrueto, M., T. D. Jessen, R. Diepstraten, and M. Musiani. 2023. Density and genetic diversity of grizzly bears at the northern edge of their distribution. Ecosphere doi.org/10.1002/ecs2.4523 • Rescan. 2012. Doris North Gold Mine Project; Final Grizzly Bear DNA Report, 2012. Prepared for Hope Bay Mining Limited by Rescan Environmental Services Ltd.
IDENTIFICATION OF ISSUE	
Land-based camera traps alone may be insufficient to generate reliable estimates of grizzly bear and wolverine abundance and distribution across the RSA. As such, the GN recommends enhancing data collection through the use of hair snagging posts.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	

Section 3.3.1 of the Wildlife Report states,

> "In previous years, the camera program has shown decreased effort during winter from December through February due to snow covering the camera lenses, which resulted in a loss of effort for most days (Table 3.3-1). In 2025, effort remained relatively consistent across all months, despite intermittent snow covering the lenses… An increasing number of cameras have been knocked down each period, typically by grizzly bears, based on 2019 data... Of the 60 Doris cameras that were deployed in September 2024, 22 were found knocked down during camera checks in 2025; this is a 36% knock-down rate: higher than the 30% knock-down rate noted in 2019 and the 18% knock-down rate in 2024. Camera tripods are repaired as required. While 60 cameras were deployed at the start of the monitoring period, only 55 cameras were analyzed, as discussed in Section 3.2.1." (Agnico Eagle, 2026, p.3-6)

Camera issues can induce detection gaps and biases (like repeated observations of the same individual) that undermine reliable estimates of grizzly bear and wolverine use across the RSA. Also, camera data cannot be used to assess population-level effects. However, the primary objective of this program is to determine whether Project activities influence the abundance and distribution of both species over time.

To address these limitations, the GN recommends augmenting the camera network with a DNA hair snagging program using a systematic grid of posts across the RSA. When paired with cameras where feasible, hair-snagging enables robust genetic identification and supports spatial capture-recapture analyses, providing a more reliable population trend and movement information than cameras alone.

For grizzly bear, the 2010–11 Rescan (2012) study offers a useful baseline. There is now a need to monitor the spatial and temporal trends in the abundance, distribution and movement in and around the project area. Spatially explicit capture–recapture (SECR) methods and software have advanced considerably since the earlier analysis and should therefore be considered in future monitoring.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Set up a hair snagging grid across mine infrastructure and RSA to collect genetic samples with which to determine grizzly bear and wolverine individuals and their use of the RSA and interactions with mine infrastructure.

The GN recommends that the Proponent undertake the following:

2. To ensure consistency and improve regional comparability, resample the RSA using a standardized hair-snagging grid. The GN recommends adopting the methods recently used in the Kitikmeot region (Awan et al. 2023, 2025) and by Barrueto et al. (2023) around the NWT diamond mines.

GN AR 06	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No 003
	  ○ Terms and Conditions 25–27, 29
	• Project Certificate No 009
	  ○ Terms and Conditions 4 & 22
	  ○ Commitment 41 (2018)

Responsible Party	• No: 25–27 • Yes: 4, 22, 41
References	• Agnico Eagle Mines. Hope Bay 2025 Annual Report: Appendix C2: Hope Bay Mine 2025 Wildlife Mitigation and Monitoring Program Compliance Report (April 2026) • Agnico Eagle Mines. Hope Bay 2024 Annual Report: Appendix F.5: Wildlife Mitigation and Monitoring Plan (April 2025)

IDENTIFICATION OF ISSUE

The GN notes that the 2025 Wildlife Report does not include any of the required noise monitoring data or any information on the related caribou behaviour monitoring outlined in the WMMP.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Commitment 41 states,

> "a) TMAC will conduct noise measurements during quarry blasts at 2.8 and 4 km to confirm predictions.
> b) TMAC will confirm that the overpressure value of 96 Lpeak dBZ will not exceed at 2,800 m from the location of the blast.
> c) TMAC will conduct a behaviour monitoring program during blasts if caribou are observed beyond 2.8 km to evaluate how caribou respond to blasts.
> d) TMAC will include methods in WMMP to determine potential calving ground overlap with the Project." (NIRB, 2018)

Additionally, the Noise Monitoring Standard Operating Procedure (Appendix C in the 2025 Wildlife Report) states,

> "Agnico Eagle will complete an annual noise monitoring report following data collection. The report is to include a summary of the methods and equipment used to gather noise data, summary tables indicating weather conditions, noise data, graphs of raw noise data, a map showing the location of the monitoring sites, and photos of each site." (Agnico Eagle, 2026, p. 8)

Despite the references provided above, the GN notes that the 2025 Wildlife Report does not include any of the required noise monitoring data. Instead, the 2025 Wildlife Report only states,

> "However, in real-world testing, the wind onsite is so loud, and the noise of quarry blasting so muted at 2.8 km, that the blast cannot be picked out of the background noise to evaluate if the 2.8 km should be increased or decreased. In practice, the Environment Department delays quarry blasts if any caribou are visible, regardless of distance. Given the difficulty in trying to set a specific buffer based on noise measurements, it is proposed to update the WMMP to abandon the use of noise and distance buffers and simply continue to follow the existing management measure of delaying blasts if any caribou are observed." (Agnico Eagle, 2026, p.2-12)

Without this information or any comprehensive supporting memo, the GN does not see a clear justification for the Proponent's proposal to "abandon the use of noise and distance buffers" (Agnico Eagle, 2026, p. 2-12).

The WMMP's existing management measure entails the "cessation of blasting until animals move >2.8 km from the quarry or the line of sight from the quarry high point, whichever is closer" (Agnico Eagle, 2025, p. 6). It is therefore unclear what the Proponent means by the broader statement that blasts are delayed "if any caribou are observed," and whether this represents a change from the currently approved mitigation.

Finally, the WMMP calls for "monitoring of caribou behaviour in response to quarry blasting if safe to do so" (Agnico Eagle, 2025, p. 7). Yet, the 2025 Wildlife Report does not describe any efforts by the Proponent to carry out this monitoring.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Submit the complete 2025 noise monitoring dataset, including raw measurements, weather records, time history plots, site maps, and all supporting analysis, as required under Commitment 41 and the Noise Monitoring SOP.
2. Provide a clear justification, in a memo or equivalent documentation, for any proposal to discontinue noise-based monitoring, and clearly identify whether this would change the currently approved mitigation measures or reflect existing practice.
3. Explain the lack of information regarding caribou behaviour monitoring during blasts.

The GN recommends that the Proponent undertake the following:

4. Assess the feasibility of supplementing acoustic monitoring with seismic monitoring to address persistent wind interference and improve the ability to detect important aspects of blast events that could be disruptive to caribou. This should include evaluating seismic activity at the blast site and at set distances, alongside observed behavioural responses of wildlife, particularly caribou, at corresponding distances.

GN AR 07	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 003
	  ○ Terms and Conditions 25–27
	• Project Certificate No. 009
	  ○ Term and Condition 20
	  ○ Commitment 45, 51 & 52 (2018)

Responsible Party	• No: 20, 25–27 • Yes: 45, 51 & 52
References	• Agnico Eagle Mines Limited. Hope Bay Mine 2025 Annual Report – Appendix C: Hope Bay Mine 2025 Wildlife Mitigation and Monitoring Program Compliance Report. (March 2026) • Agnico Eagle Mines Limited – Hope Bay. Wildlife Mitigation and Monitoring Plan (January 2023) • Agnico Eagle Mines Limited – Hope Bay. Wildlife Mitigation and Monitoring Plan (April 2025) • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle's Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project 2024 Annual Report (June 2025)

IDENTIFICATION OF ISSUE

In 2025, the GN commented on the Proponent's traffic monitoring program as presented in the 2024 Wildlife Report. While some of the GN's concerns have been resolved, others remain.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

<u>Missing Data</u>

The Proponent's 2025 Wildlife Report states that,

> "…data was only collected for camera 18 for 3 months (September 2024 and July to August 2025) and camera 35 for 5 months (September to November 2024 and July to August 2025) due to problems with camera batteries within the monitoring period." (Agnico Eagle, 2026, p. 27).

The GN notes that this deficiency reflects a recurring issue. In last year's annual report, the Proponent cited camera card malfunctions as the cause for the absence of several

months of data (GN, 2025, p.3–5). However, the GN acknowledges that in the 2025 Wildlife Report, the Proponent has begun the "…implementation of a more robust camera servicing program in November 2025, which includes bi-weekly servicing and cleaning of the cameras." (Agnico Eagle, 2026, p. 30). The GN is optimistic that this will improve data collection in future years.

Vehicle Composition and Other Data

In last year's annual report, the GN noted vehicle composition (i.e., lightweight vehicles and heavy equipment) was not detailed in the 2024 Wildlife Report, despite it being a requirement of the Project's WMMP. The GN notes that in this year's Wildlife Report, the Proponent has provided details on vehicle composition (e.g., Table 2.2-4).

Relatedly, the GN emphasizes the value of recording additional traffic information such as date, time, location, and speed. These variables are essential for analyzing a consistent time series alongside telemetry, observational, and behavioural monitoring data. Integrating these datasets in annual reports will enable a more quantitative assessment of Project impacts (such as required through GN Commitment 45) and the effectiveness of mitigation measures.

Conclusions

The Proponent's 2025 Wildlife Report states that,

> "All 3 months with available data from camera 18 were above predictions from the Madrid Boston FEIS for the daily average transits from Roberts Bay to Doris (Table 2.2-2). Traffic between Roberts Bay and Doris was above the predicted levels, with an overall average of 39.1 daily transits, compared to a predicted peak of 20 transits (Table 2.2-2). This greater than-predicted traffic volume did not account for the arrival of the sealift to the Mine that occurs during this time period." (Agnico Eagle, 2026, p. 29)

And then concludes that,

> "Final Hearing Commitment 52 establishes the need to compare current traffic levels to predictions in the Madrid-Boston [Final Environmental Impact Statement (FEIS)] and to enhance wildlife protection measures if levels are exceeded by greater than 25% in two consecutive monitoring periods. Additional traffic is occurring during an advanced exploration program while the Mine remains in Care and Maintenance in 2025, and as a result, the traffic levels do not align with the volume originally predicted in the Madrid-Boston FEIS. <u>While the traffic volumes were above the predicted seasonal or annual average for Camera 18, this time period coincides with the time when very few caribou are at the Mine, resulting in no need for further protection measures</u>." (Agnico Eagle, 2026, p. 31)

<u>Emphasis added</u>

The GN does not agree with the logic or conclusions presented by the Proponent. It is not possible to assume that the months with missing data did not also experience elevated traffic. The Proponent's assertion that no further protection measures were

required is unsupported, particularly given that Camera 18 was missing data for the majority of 2025.

Additionally, the GN notes that the Proponent states that FEIS traffic levels were exceeded but attributes this exceedance to the ongoing advanced exploration program. However, the Proponent has not demonstrated efforts to separate (for reporting purposes) Project-related traffic from traffic generated by concurrent exploration activities; this distinction is essential because conflating the two obscures the traffic-trigger thresholds in Commitment 52 and prevents a clear assessment of whether enhanced wildlife protection measures are warranted.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Justify the conclusion that no additional evaluation of wildlife protection measures was needed in 2025 (with respect to camera 18), despite the majority of the year missing data during the reporting period.
2. Collect additional traffic data, such as date, time, location, speed, and include this information in the 2026 annual report, either integrated into relevant graphs or provided in an appendix.

GN AR 08	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 003
	  ○ Terms and Conditions 22, 25–27
	  ○ Commitment 6
	• Project Certificate No. 009
	  ○ Commitments 60 & 61 (2018)

Responsible Party	• No: 6, 25–27 • Yes: 22, 60, 61
References	• Agnico Eagle Mines Limited. Hope Bay Mine 2025 Annual Report – Appendix C: Hope Bay Mine 2025 Wildlife Mitigation and Monitoring Program Compliance Report. (March 2026) • Agnico Eagle Mines Limited – Hope Bay. Wildlife Mitigation and Monitoring Plan (April 2025) • Government of Nunavut. Government of Nunavut Comments on Agnico Eagle's Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project 2024 Annual Report (June 2025) • Government of Nunavut. Government of Nunavut Comments Agnico Eagle's Doris North Gold Mine Project and Phase 2 Hope Bay Belt Project 2023 Annual Report (July 2024)

IDENTIFICATION OF ISSUE

In the 2025 Wildlife Report, the GN notes recurring deficiencies in the information provided for helicopter and fixed-wing aircraft reporting.

These recurring reporting 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

The GN notes that the 2025 Wildlife Report contains deficiencies similar to those previously identified (GN, 2024; GN, 2025).

The Project's WMMP sets out clear requirements with respect to minimum flight altitudes and horizontal setback distances (Agnico Eagle, 2025, p. 14).

The WMMP also sets out clear requirements for documenting helicopter activity. For example, the WMMP states the following:

> "3.1.5.4 Helicopter Air Traffic: Helicopter flight paths will be recorded by on-board Global Positioning System (GPS) devices including date, time, location, and elevation. Results will be summarized in the annual Wildlife Mitigation and Monitoring Program Compliance Report (the annual compliance report to address Project Commitment #GN-60 from Project Certificate No. 009 (NIRB 2018)" (Agnico Eagle, 2025, p. 33)

In 2025, the GN flagged the absence of 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).

In response, Agnico Eagle stated

> "Agnico Eagle makes sure that aircraft and helicopter pilots are aware of and abide by the mitigation from the WMMP Plan from the section Aircraft Management. Agnico Eagle will provide available information from helicopter flight logs in future WMMP Compliance Report submissions. Details such as the flight above ground level for example, are not logged as helicopter pilots fly at certain heights based on specific tasks and as per the WMMP." (Agnico Eagle, 2025, p.68)

However, the GN did not find any additional helicopter flight-log information in the 2025 Wildlife Report. Moreover, the reassurance that pilots fly at certain heights based on specific tasks does not demonstrate compliance with the WMMP, nor does it replace the requirement for documented flight-height data. This omission represents a clear reporting gap. Flight height is a critical component of the Project's WMMP, as it is a key mitigation measure intended to reduce disturbance to wildlife.

To suggest that flight altitude is not logged is inconsistent with current industry standards. Modern aviation global positioning systems, including software such as foreflight is widely utilized within all modern aircraft. Flight logs recording speed, altitude, date and time, and flight tracks are commonplace within these devices and easily downloaded at the end of each flight. There is no technological reason why this information cannot be collected and provided for compliance and monitoring purposes.

Additionally, the 2025 Wildlife Report states,

> "Helicopter use around Doris was above the Madrid-Boston FEIS prediction, ranging from 1 to 28 daily trips with an average of 9.7 trips per day (Table 2.3-1). The additional helicopter flights are attributed to the Mine undertaking an advanced exploration program while remaining in Care and Maintenance in 2025. As a result, helicopter activity continues to not align with the number of helicopter flights originally predicted in the Madrid-Boston FEIS." (Agnico Eagle, 2025, p. 2-9)

Similar to the GN's above comment (GN AR 07), the GN notes that the Proponent states that FEIS daily helicopter trip levels were exceeded but attributes this exceedance to the ongoing advanced exploration program. The GN recognizes that the 2025 Wildlife Report includes Appendix A: Helicopter Trip Log, 2025. Yet, this appendix does not clearly state which flights were specifically for the Project and which were for the advanced exploration program.

REQUEST(S)/RECOMMENDATION(S)

The GN again requests that the Proponent provide flight logs that include date, time of day, flight purpose (including a broad category for the Project versus Exploration), flight track, flight's mean altitude and/or height above ground level (AGL), justification for low-level flights (weather notes before and after flights, and wildlife observations way pointed within the same logging device by the pilot and/or passenger.