



Kugluktuk

Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
X0B 0C0

Bathurst Inlet
Kingaok

June 19th, 2026

Bay Chimo
Umingmaktok

Re: Review of AEM's 2025 Annual report for Hope Bay Project Certificate NIRB No. 009.

Dear Keith Morrison, the KIA has reviewed AEM's 2025 Annual Report for the Hope Bay project to the NIRB.

Cambridge Bay
Ikaluktutiak

1) Compliance Monitoring:

Gjoa Haven
Okhoktok

The KIA's Framework Agreement (FA) and Inuit Impact and Benefits Agreement (IIBA) with Agnico Eagle Mines Limited (AEM). the cover terms and conditions of NIRB Project Certificate 009 and the NWB Type A water licenses.

Taloyoak

The Framework Agreement is a confidential agreement between KIA and AEM that supersedes and replaces all previous contractual arrangements between both parties. Section 3.1 of the FA covers Terms and conditions of land use license and reporting.

Kugaaruk

Appendix A of Section 3.1 of the Framework Agreement specifies the details of annual reporting by AEM to the KIA, which is summarized as follows:

AEM is to provide an annual report to KIA providing details of its operations under any land use License, Advanced Exploration Lease and/or Commercial Lease covering the location and operations area of lands affected, and the nature of facilities and equipment at these sites. In addition, AEM is to provide details of progressive reclamation or closure activities undertaken during the year and details of all permits, licenses, and authorizations from other regulatory bodies or agencies that are required for operations.

This annual report is to provide information on:

- Ground disturbances including land use activities for camps, infrastructure, equipment, winter roads and trails.
- Fuel and Chemical storage including Chemicals of Potential Concern inventory (COPC), fuel and chemical usage, and spill records.
- Drilling programs, locations, and methods.
- Water use and effects on water.



- Wildlife interaction, data logs, and summaries.
- Waste disposal, waste management practices, inventory of waste on site, and inventory of hazardous materials or non-combustible waste removed from site.
- Closure and reclamation progress is associated with waste management, drilling, and ground disturbance along with associated costs.
- General information on annual inspection activities by staff and other agencies and their results, community consultations, future exploration work plans, submissions to NIRB, NWB, or NPC or other regulators related to mining activity, archaeological sites and burial grounds, and any incidents of storage or possession of alcohol and drugs on site.

AEM has provided the KIA with the **Hope Bay Project 2025 Annual Report for KIA Framework Agreement** in accordance with Appendix A to Schedule 3.1 of the Framework Agreement. This report is separate from the **Hope Bay Project 2025 Annual Report to the NIRB**.

The socio-economic impact of the project on affected communities of Nunavut is covered by the IIBA, which is summarized here.

Inuit Impact and Benefits Agreement (IIBA) – Summary.

The Project was in care and maintenance in 2025 (at the Doris site) and in active exploration at Madrid. The KIA notes that up to 35 Inuit from Kitikmeot (about 4.5% of the total workforce) were employed at the Project in 2025, compared to a maximum of 38 in 2024. Up to 20 Inuit workers were employed from other communities. Inuit workers worked a total of 67,232 hours (6% of overall effort or the equivalent of 30.8 FTEs). Of this total, Kitikmeot Inuit worked 44,708 hours or 4.1% of total effort in 2025. The total hours worked increased in 2025 due to increased activity, including exploration programs and site upgrades. Most Inuit employees came from Gjoa Haven and Cambridge Bay. The rate of Inuit turnover decreased since last year from 19% to 11%. This is a positive trend, especially when compared to non-Inuit employees. There was no insight into the report as to why there was an improvement in turnover. KIA expects that Inuit employment will continue to rise as the Project resumes operations.

Approximately \$354.9 million in expenditures was made to businesses in 2025, which was triple the amount spent in 2024. Of this amount, \$77.4 million (22.0%) was expended to Kitikmeot Qualified Businesses.

Indicator findings for the Hope Bay Project were positive for Demographics, Employment, Business Opportunities, and Economic Development. Findings for Education and Training are neutral. Only Health and Community Well-Being was largely negative. KIA expects that indicator findings for Education and Training, and



Health and Community Well-Being to improve if the Project resumes. The KIA will continue to monitor and seek reasons for indicator outcomes.

Overall, the KIA views the project as having a positive impact on the Kitikmeot region. Agnico Eagle's labour force analysis (2025) concluded that the Kitikmeot region faces significant labour supply constraints, and that meeting workforce demands would be challenging, particularly for skilled roles. KIA looks forward to advancing work on implementing the IIBA with AEM as the project begins a heavy construction period.

Internal Report on September Hope Bay Inspection – July 16 to 18, 2025

Summary

The inspection of the Hope Bay mine site and facilities was conducted from July 16th to 18th as per the established inspection schedule. Jason Inkster and Guy Dufour of Agnico Eagle Mines Ltd. (AEM) accompanied John Roesch and Cory Barker on the inspection. Sixty-three site components out of 117 components were inspected in accordance with the established schedule.

Overall, the mine site is being maintained in good condition while in care and maintenance. Robert's Bay, the Airstrip and Access Road, Doris North, Waste Management Area, Secondary Road, the TIA Area, Windy Road and Windy Lake Camp, and Madrid North were inspected. On-going exploration is being done at Doris North around Patch Lake. Boston Camp is currently closed. Further cleanup activities will occur here.

A new pipeline was built at the tank farm for offloading fuel, and all tanks are connected to this pipeline. The fuel transfer was placed too high and should have been put lower on the road so caribou can step over it. The concrete base should have been 10 cm (4") tall and have short adjustment rods as well. The road should have been widened on both sides prior to installing the fuel transfer pipe to facilitate vehicles. A lower transfer pipe should have been placed on left side shoulder. The fuel transfer pipe should be buried to facilitate snowmobiles in the location identified by the IEAC.

The jetty is being expanded as planned. The steel that is being stored in the jetty lay down area is from TMAC and will be donated to the Hamlet of Cambridge Bay for use for rebuilding the dock.

The crushing and milling plant has been gutted for retrofit. Some equipment will be repurposed such as the ball mill and screens. Other equipment is to be salvaged and resold on the open market. The building will be expanded west, and the ore stockpile will be moved to behind the building. A new building and annex is to be constructed.

A new power plant is to be built at Doris North, and the current power plant will be used for backup power generation.



The North Dam is in good condition with no cracking at the crest or water leakage at the toe. South Dam is in good condition, and future plans include building up the current road in elevation and to create a berm going along the south-west hill to contain tailings. Tailings are being recovered to build up the North Dam. The Madrid North, Naartok Portal is open and goes down about 150 metres. A new workshop facility has been constructed at this location. A new sump is being constructed at the Madrid waste rock pile. Windy Camp is remediated. The old fuel spill is fully revegetated.

Compliance Status

2) Effects of Monitoring:

a) Whether the conclusions reached by AEM in the Hope Bay 2025 Annual Report to the NIRB are Valid.

KIA's consultants in the areas of wildlife, aquatic sciences, and geotechnical engineering reviewed the Hope Bay 2025 Annual Report to the NIRB and the following documents:

- Appendix A. Concordance Table.
- Appendix B. Site Layouts.
- Appendix C. Compliance Monitoring Reports.
 - Appendix C-1. Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report-Doris and Madrid Project.
 - Appendix C-2. 2025 Wildlife Mitigation and Monitoring Program Compliance Report.
 - Appendix C-3. 2025 Socio-economic Monitoring Program Report.
 - Appendix C-4. Archaeological Site Status Summary
 - Appendix C-5. 2025 Aquatic Effects Monitoring Program Report.
- Appendix D. Hope Bay 2025 Effluent Monitoring Reports.
- Appendix E. Updated Monitoring and Management Plan.
 - Appendix E.1: Care and Maintenance Plan.
 - Appendix F.2: OPPP/OPEP.

Our consultants find AEM's four conclusions are partially valid and another eight conclusions to be invalid for which they disagree with and have commitments on for the 2025 Annual Report.

AEM has presented adequate information to demonstrate the Hope Bay Project has complied with most of the project certificate terms and conditions with some not valid or partially valid to of our consultants.



- b) Any areas of significance requiring further supporting information or changes to the monitoring program, which may be required.

Hope Bay 2025 Annual Report to NIRB

KIA-NIRB-01

Review Comment Number	KIA-NIRB-01
Subject/Topic	2025 Stack Testing Results
References	2025 Annual Report - Hope Bay Mine (Submitted to Nunavut Water Board) (March 2026) Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report - Hope Bay Mine (Doris and Madrid Sites) (March 2026)
Summary	2025 Stack Testing Results were not included in the submission to NIRB. They were only included in the annual report submitted to the NWB.
Detailed Review Comment	<p>The 2025 stack testing results were included in the annual report submitted to the Nunavut Water Board (NWB), but this information is missing from both the “Q1–Q3 2025 Atmospheric Compliance Monitoring Program Report” and the annual report submitted to the Nunavut Impact Review Board (NIRB).</p> <p>These results should also be included in the NIRB submission and the atmospheric compliance monitoring report, particularly because the stack testing was conducted on August 23–26, 2025, which falls within the Q1–Q3 reporting period.</p> <p>This omission is important because, according to the annual report submitted to the NWB, “the average stack concentrations of dioxins and furans, reported on a toxic equivalent basis, was 0.18 ng TEQ/Rm³. This concentration is above the CWS/Nunavut stack limit of 0.08 ng TEQ/Rm³ at the same conditions.” This means that, during the Care and Maintenance period, the concentration of these toxic pollutants was approximately 2.25 times the applicable limit, or 125% above the defined limit.</p> <p>Failing to include this information in the relevant air quality reports could underestimate the significance of air quality concerns at the site. Dioxins and furans are persistent toxic pollutants that may pose risks to human health, biodiversity, soil quality, and vegetation through air emissions and subsequent deposition. Therefore, these exceedances should be clearly reported, assessed, and discussed in the applicable NIRB and atmospheric compliance monitoring</p>



KIA-NIRB-03

Review Comment Number	KIA-NIRB-03
Subject/Topic	Air Dispersion Modelling Area
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report - Hope Bay Mine (Doris and Madrid Sites) (March 2026) <ul style="list-style-type: none"> ○ Page 3 (Section 2.2)
Summary	The air dispersion modelling only covers areas outside of the property boundary.
Detailed Review Comment	In the report, it is stated that: “The dispersion modelling utilized a maximum emissions scenario that was expected to result in the maximum predicted concentration of each contaminant outside of the modelled property boundary.” However, a large, unfenced area is excluded from the modelling. While standards within the property boundary may differ from ambient air quality standards and may be addressed through the use of health and safety equipment (e.g., wearing masks during dust-generating work), air dispersion modelling and the comparison of model outputs against applicable standards are two separate steps. A different approach to the second step should not result in the first step being omitted. Given the size of the property, and the fact that community members, wildlife, and employees use this area, leaving a large area with unknown air quality conditions could be problematic and potentially pose health risks.
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please clarify why the modelling does not include the property boundary.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-04

Review Comment Number	KIA-NIRB-04
Subject/Topic	Unit Conversion for NO2 Standard
References	Hope Bay 2025 Annual Report (April 2026)



	<ul style="list-style-type: none"> Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report - Hope Bay Mine (Doris and Madrid Sites) (March 2026) <ul style="list-style-type: none"> Table 2.1 Ambient Air Quality Standards, Objective and Guidelines Compared to the 2017 FEIS Predictions (page 5)
Summary	It is unclear how the NO ₂ standard was converted from ppb to µg/m ³ .
Detailed Review Comment	It is unclear how the NO ₂ standard was converted from ppb to µg/m ³ . In Table 2.1, the 1-hour NO ₂ standard is reported as 42 ppb. However, 83 µg/m ³ is presented as the equivalent concentration. This conversion is unclear, as our calculation gives a different value: $42 \times 46.01 / 24.45 = 79.0 \mu\text{g}/\text{m}^3$
Recommendation/ Request	The KIA requests the following: <ul style="list-style-type: none"> Please clarify the conversion method and assumptions used, including the temperature and pressure conditions applied.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-05

Review Comment Number	KIA-NIRB-05
Subject/Topic	Identifying Outlier Data
References	Hope Bay 2025 Annual Report (April 2026) <ul style="list-style-type: none"> Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report - Hope Bay Mine (Doris and Madrid Sites) (March 2026) <ul style="list-style-type: none"> Page 13 and Page 14
Summary	More information is needed regarding identified outliers
Detailed Review Comment	Page 13: The report states: <i>“Data collected from the continuous monitors were screened for any suspicious data including outliers, instrumentation drift and missing data following the protocols provided by ECCC in the document National Air Pollution Surveillance Network Quality Assurance and Quality Control Guidelines.”</i> However, information is provided regarding the criteria used to identify outliers or how many measurements were classified as outliers.
Recommendation/ Request	The KIA requests the following:



	<ul style="list-style-type: none"> Please clearly explain how data were identified as outliers and how many data points were excluded as outliers. Please also provide the same clarification for NO₂ on page 14.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-06

Review Comment Number	KIA-NIRB-06
Subject/Topic	Number of Monitoring Stations for PM _{2.5} and TSP
References	Hope Bay 2025 Annual Report (April 2026) <ul style="list-style-type: none"> Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report - Hope Bay Mine (Doris and Madrid Sites) (March 2026) <ul style="list-style-type: none"> Page 13
Summary	It seems that TSP and PM _{2.5} levels were measured at only one station.
Detailed Review Comment	Considering the size and spatial extent of the project area, and the expansion of project activities over time, measuring PM _{2.5} and TSP at only one station, DFA-1, may not be sufficient to understand ambient air quality across the site. A single monitoring location may not capture spatial variability in particulate concentrations. This could introduce substantial uncertainty into the interpretation of the monitoring results and may limit the ability to determine whether particulate levels are representative of conditions in other parts of the project area.
Recommendation/Request	The KIA requests the following: <ul style="list-style-type: none"> Please explain why one station is being used to monitor PM_{2.5} and TSP levels across the site.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-07

Review Comment Number	KIA-NIRB-07
Subject/Topic	Potential Effect of the Care and Maintenance Phase on Pollutant Concentrations



	<ul style="list-style-type: none"> Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report - Hope Bay Mine (Doris and Madrid Sites) (March 2026) <ul style="list-style-type: none"> Page 25
Summary	Malfunctions of monitoring devices were linked to low ambient temperatures; however, there were colder months with much less missing data.
Detailed Review Comment	<p>In the report, it is stated that: <i>“Other than January and February 2025, the monthly data recovery rates for the continuous sampling are above the objective of 75%. The PM_{2.5} monitor malfunctioned several times in January and February 2025, due to the low ambient temperatures.”</i></p> <p>However, based on the meteorological data presented on page 33, the mean, minimum, and maximum temperatures in March 2025 were lower than those recorded in February 2025, yet the data recovery rate in March was higher. This looks inconsistent with the explanation that the January and February data loss was due to low ambient temperatures.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please clarify why low temperature was identified as the cause of the PM_{2.5} monitor malfunctions in January and February, but why similar data losses did not occur in March, when temperatures were lower.
Agree or Disagree with Compliance Statement	N/A
Importance	Moderate

KIA-NIRB-09

Review Comment Number	KIA-NIRB-09
Subject/Topic	Recorded Meteorological Data
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> Q1-Q3 2025 Atmospheric Compliance Monitoring Program Report - Hope Bay Mine (Doris and Madrid Sites) (March 2026) <ul style="list-style-type: none"> Page 33
Summary	The meteorological summary table contains multiple inconsistencies and unclear values that should be reviewed.
Detailed Review Comment	<ul style="list-style-type: none"> The first column shows July as 2024, while the other months are shown as 2025. This seems to be a potential typo.



	<ul style="list-style-type: none"> • The column “Total Bright Sunshine Hours” shows values of 0 for the first few months, while the corresponding solar radiation values are non-zero. This seems inconsistent. • For May 2025, the sum of total rainfall and total SWE is greater than the reported total precipitation value (15.6 mm vs. 15 mm). This discrepancy should be reviewed. • The monthly total rainfall values seem to sum to 78.6 mm, while the total row reports 78 mm. This may be due to rounding, but it needs to be corrected. • The use of “average” values for variables such as Maximum Instantaneous Wind Speed, Absolute Maximum Temperature, and Maximum Daily Air Temperature is unclear. These values may be difficult to interpret unless the report explains how they were calculated and what they represent.
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please double-check the meteorological summary table, correct any errors, and clarify any values or summary statistics that may be inconsistent or difficult to interpret.
Agree or Disagree with Compliance Statement	N/A
Importance	Low

KIA-NIRB-10

Review Comment Number	KIA-NIRB-10
Subject/Topic	Traffic Volumes Above FEIS Predictions
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Table 1, pg iii ○ Section 2.2, pg 2-4 – 2-8
Summary	Traffic volumes exceeded FEIS predictions in many instances due to advanced exploration activities occurring while the mine was in Care and Maintenance, but adaptive management strategies as required by Term and Condition No. 20 are not discussed.
Detailed Review Comment	Table 1 Summary of the 2025 wildlife mitigation monitoring plan compliance report results states “ <i>additional traffic is occurring while the mine is undertaking an advanced exploration program while remaining in Care and Maintenance in 2025 and as a result, the traffic</i>



	<p><i>levels do not align with the volume originally predicted in the Boston-Madrid FEIS.”</i></p> <p>Camera data were 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. Therefore, total yearly traffic trips were not adequately recorded. Vehicle traffic exceeded FEIS predictions in all months for which data were collected for Camera 18 and for one month on Camera 35. Given the paucity of data traffic likely exceeded predictions in other months as well at both monitoring locations.</p> <p>Term and Condition No. 20 states “where traffic levels exceed levels predicted for the Project, the Proponent shall develop and implement appropriate enhancements to its wildlife protection measure.” While exceedances are attributable to advanced exploration activities not assessed in the FEIS but facilitated by transport along infrastructure assessed in the FEIS, there is no evidence within the report that any additional adaptive management to protect wildlife were employed as required by the FEIS for traffic exceedances.</p>
<p>Recommendation/ Request</p>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • An explanation of why additional wildlife protection or adaptive management measures were not implemented in response to traffic exceedances, as required under Term and Condition No. 20 or development of additional wildlife protection measures as required by Condition No. 20 (if this determination required analyzed data to be triggered). • A description of any wildlife mitigation enhancements, adaptive management measures, or operational controls that were implemented in response to increased traffic volumes associated with advanced exploration activities, including implementation dates and effectiveness monitoring, if applicable. • A description of how the exceedances may have affected wildlife, specifically caribou and grizzly bears and whether there are data available that could answer this question. • While a comment has been made to increase the frequency of camera and battery checks, the camera-based traffic monitoring program is considered unsuccessful for this monitoring period due to insufficient data collection, and it is insufficient to demonstrate compliance with the FEIS traffic predictions and wildlife mitigation requirements. The proponent should either commit to frequent (i.e., monthly or more frequent) battery and camera checks or consider concurrent alternative monitoring approaches, such as installing stationary traffic counters with larger-capacity



	batteries, to improve equipment reliability and ensure consistent collection of traffic data.
Agree or Disagree with Compliance Statement	Disagree, partial compliance.
Importance	Moderate

KIA-NIRB-11

Review Comment Number	KIA-NIRB-11
Subject/Topic	Mortality Reporting
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Appendix G (to Appendix C), Table 1, pg 1 of 2
Summary	Mortalities were not reported to the conservation officer as required by Term and Condition No. 23.
Detailed Review Comment	The report identifies 10 wildlife mortalities during the reporting period, including several mortalities potentially associated with vehicle strikes. However, the report only provides evidence of an incident report being submitted for a single mortality event – the caribou (see Comment KIA-NIRB-15). Term and Condition No.23 requires the proponent to file an incident report with the local wildlife conservation office for all direct wildlife mortalities associated with the Project. These reports are required to include sufficient detail regarding how existing monitoring and mitigation measures failed to prevent the mortality, as well as the corrective or adaptive management measures that would be implemented to prevent similar incidents from reoccurring. There is no evidence provided in the annual report that a conservation officer was contacted for mortalities directly associated with project activities.
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • For any wildlife mortality events for which incident reports were not submitted, provide a detailed explanation of why reporting was not completed and how the Proponent considers this to be consistent with Term and Condition No. 23. • A description of all corrective actions, adaptive management measures, or additional wildlife protection measures implemented or proposed in response to the wildlife mortalities, including measures intended to reduce the risk of future wildlife-vehicle collisions associated with Project traffic.



Agree or Disagree with Compliance Statement	Disagree, partial compliance. The requirement to report mortality events in the annual report was met; however, the requirement to notify the Wildlife Conservation Officer of mortality events was largely not met or reported on and is considered non-compliant.
Importance	Moderate

KIA-NIRB-12

Review Comment Number	KIA-NIRB-12
Subject/Topic	Arctic Fox Mortality
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Appendix G (to Appendix C), Table 1, pg 1 of 2
Summary	The report provides insufficient investigation or evidence to support conclusions about the Arctic fox mortality.
Detailed Review Comment	<p>The record of this wildlife mortality event lacks sufficient detail and appropriate caution in interpretation. The entry notes that a dead Arctic fox was found behind the STP in June 2025, and separately that a limping Arctic fox had been observed around camp earlier in the winter. While the report suggests these may be the same individual, this is speculative and not supported by any identifying evidence. Although such a linkage is possible, it is not substantiated and should not be inferred without confirmation. The report also concludes that the cause of injury and death are unknown, with no documented follow-up investigation or causal assessment.</p> <p>In addition, the determination that “no action is required” is not supported by an explanation of how potential contributing factors were assessed or ruled out, including the proximity to infrastructure and the STP, which may present attractant related implications for wildlife. The lack of an investigation or consideration of mitigation or adaptive management measures limits the ability to determine whether Project activities contributed to the mortality or whether preventative actions are warranted to reduce the likelihood of similar occurrences in the future.</p>
Recommendation/ Request	<ul style="list-style-type: none"> • The KIA requests the following: • A detailed account of the investigation conducted into the Arctic fox mortality, including any field observations, necropsy (if applicable), or evidence used to assess cause of injury and death.



	<ul style="list-style-type: none"> Clarification to conclude that no further action is required, including how potential contributing factors (e.g., proximity to STP operations) were evaluated and ruled out.
Agree or Disagree with Compliance Statement	Noncompliant with Term and Condition No. 23 (see comment KIA-NIRB-14 for further information on NIRB requirements for Term and Condition No. 23).
Importance	Low

KIA-NIRB-13

Review Comment Number	KIA-NIRB-13
Subject/Topic	Fall Avian Stand and Watch Surveys
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> Section 3.1, pg 3-42 – 3-44
Summary	Insufficient Monitoring to Capture Migration
Detailed Review Comment	<p>The avian migration monitoring methods described do not appear sufficient to adequately characterize migratory bird use and collision risk associated with the proposed wind turbine development. The reported survey effort consisted of stand watch surveys completed at each location over a narrow period in early September 2025, supplemented by two autonomous recording units (ARUs) deployed for four weeks. This limited temporal coverage may not adequately capture the variability in migration timing, intensity, species composition, flight behaviour, or peak migration events that can occur throughout the fall migration season under varying weather conditions. Further, wind and weather conditions are identified as limiting factors, raising uncertainty as to whether the ARUs will yield representative data.</p> <p>In addition, the report does not provide sufficient detail regarding survey duration. It is stated stand watch surveys were performed at <i>“each survey location for between 4 and 6 hours. Survey duration was shortened due to weather constraints when warranted per Environment Canada 2007.”</i> However, the total survey effort of stand watch surveys is not reported.</p> <p>Further, although stand watch surveys were scheduled to coincide with anticipated peak migration periods, it is observed bird numbers were lower than expected, suggesting that peak fall migration may have occurred earlier in 2025 than the survey window captured. This outcome further underscores the limitations of the current monitoring effort and highlights the need for additional, temporally</p>



	expanded surveys to ensure that peak migration periods and associated movement patterns are adequately characterized.
Recommendation/Request	The KIA requests the following: <ul style="list-style-type: none"> • A detailed rationale explaining how the current combination of limited duration stand watch surveys and short-term ARU deployment is considered sufficient to characterize avian migration patterns for the proposed wind turbine locations.
Agree or Disagree with Compliance Statement	Partial compliance with Term and Condition No. 28. The current monitoring program, as described, is limited in scope and does not provide a sufficiently robust basis to prevent or adequately assess potential adverse effects on birds from wind turbines.
Importance	Moderate

KIA-NIRB-14

Review Comment Number	KIA-NIRB-14
Subject/Topic	Insufficient pre-blast monitoring and failure to exclude wildlife from blasting area leading to a direct caribou mortality, and incomplete reporting of the event.
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Section 7.5, Page 7-5 • Appendix A, Concordance Table (no page numbers appear in this Appendix) <ul style="list-style-type: none"> ○ Table for Project Certificate No. 003, Amendment 02, Row for TC No. 25 ○ Table for Project Certificate No. 009, Row for TC No. 23 • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Section 3.4.3.4, Page 3-21 ○ Appendix G (to Appendix C-2), Wildlife Interactions, Incidents, and Mortalities Recorded at the Mine, 2025 (No page numbers appear in this Appendix) • NIRB Project Certificate No. 003, Amendment 02 <ul style="list-style-type: none"> ○ Revised Term and Condition No. 25, Pages 25-26 • NIRB Project Certificate No. 009 <ul style="list-style-type: none"> ○ Term and Condition No. 21, Page 22 ○ Term and Condition No. 23, Page 23 • Wildlife Mitigation and Monitoring Plan, April 2025 <ul style="list-style-type: none"> ○ Section 2.9, Pages 15-16
Summary	Project activities and failures regarding blasting procedures led to the death of a caribou. The circumstances leading to the mortality and the mitigations to prevent such an occurrence are vague and not



	adequately defined. In addition, reporting of this caribou mortality is omitted from the main annual report, including concordance tables.
<p>Detailed Review Comment</p>	<p>Revised Term and Condition No. 25 for Project Certificate No. 003, Amendment 02 (hereafter, PC 003-02 TC 25), states:</p> <p><i>“The Proponent shall file a monitoring plan focused on assessing and mitigating interaction between wildlife and humans at the mine site, including associated infrastructure such as the TIA (Tailings Impoundment Area), roads, and activity at the waterfall and Roberts Bay. An annual report must be sent by March 30 each year to NIRB’s Monitoring Officer on interactions that have occurred, any effect the interaction might have had on humans and wildlife, and mitigation measures taken to avoid similar interactions in the future. The Proponent shall file a report to NIRB within 48 hours should any incident occur which results in wildlife mortality.”</i></p> <p>The reporting requirements section for PC 003-02 TC 25 states, <i>“To be included in the Proponent’s annual wildlife report and annual report as appropriate to the NIRB.”</i> Additional commentary for Revised Term and Condition No. 25 states, <i>“The NIRB would expect that the reporting be coordinated with the legislated requirement for TMAC Resources Inc. to report mortalities of grizzly bear, Polar Bear, muskox, caribou, wolf, and Wolverine to the local conservation officer in Cambridge Bay.”</i></p> <p>Term and Condition 21 for Project Certificate No. 009 states:</p> <p><i>“In consultation with the Government of Nunavut and other relevant authorities, the Proponent shall include criteria and procedures within its Wildlife Mitigation and Monitoring Plan (WMMP) governing the deterrence of wildlife from blast zones and the relaxation of mitigation measures for animals deemed Project-tolerant. “</i></p> <p>Term and Condition 23 for Project Certificate No. 009 (hereafter, PC 009 TC 23) states:</p> <p><i>“The Proponent shall file an incident report with the local wildlife conservation office for all direct wildlife mortalities that occur in association with the Project. Incident reports should include sufficient detail to demonstrate how monitoring and mitigation measures failed to prevent the mortality, as well as information pertaining to what measures would be put in place to prevent the incident from reoccurring.”</i></p> <p>The reporting requirements for PC 009 TC 23 states, <i>“A summary regarding incidents reported in fulfillment of this Term and Condition shall be included in the Proponent’s annual report to the Nunavut Impact Review Board.”</i></p>



Section 3.4.3.4 in the Wildlife Mitigation and Monitoring Program Compliance Report (WMMPCR) relates a caribou mortality (Page 3-21):

“A caribou mortality occurred on 27 August 2025 during routine activities at Quarry D. Pre-blast environmental monitoring and quarry sweeps did not detect any wildlife, and post-blast checks also confirmed the area was clear at that time. The caribou carcass was later discovered by an equipment operator, prompting an immediate stop-work and investigation. Follow-up findings indicated the animal had likely entered the quarry after the final sweep or was concealed among quarry material, and evidence suggested the fatality resulted from the blast impact. Notifications were issued to the KitIA and regulators, and the carcass was relocated for natural scavenging. Corrective actions included strengthening pre-blast wildlife scans, improving coverage of blind-spot areas, completing a final sweep within 30 minutes of detonation, and repeating sweeps if a blast is delayed by more than one hour.”

This caribou mortality was also recorded in Appendix G (to Appendix C-2; no page numbers available), but no additional details are provided:

“A dead caribou was found in Quarry D. Pre-blast environmental monitoring and quarry sweeps did not detect any wildlife, and post-blast checks also confirmed the area was clear at that time. The caribou carcass was later discovered by an equipment operator, prompting an immediate stop-work and investigation. Follow-up findings indicated the animal had likely entered the quarry after the final sweep or was concealed among quarry material, and evidence suggested the fatality resulted from the blast impact. Notifications were issued to regulators, and the carcass was relocated for natural scavenging. Corrective actions included strengthening pre-blast wildlife scans, improving coverage of blind-spot areas, ensuring a final sweep occurs within 30 minutes of detonation, and repeating sweeps if a blast is delayed by more than one hour. “

From these narratives, this was an interaction between project activities and wildlife, as outlined in PC 003-02 TC 25. In contrast, it is not clear if this caribou mortality was reported within 48 hours to NIRB; if it was, future annual reports should include this information to establish compliance.

According to PC 009 TC 23, the Proponent is to file an incident report with the local wildlife conservation office for all direct mortalities such as this caribou death, including not only what mitigations would be put in place to prevent such a mortality from recurring, but also to include detailed information regarding how monitoring and mitigation measures failed to prevent the mortality in the first place.



	<p>These details are not included in the annual report, nor is there indication that such details were submitted to the local wildlife conservation office.</p> <p>The Concordance Table for Term and Condition 25 of Project Certificate 003, Amendment 02 does not mention the caribou mortality, reporting that there were five mortalities in 2025, all to non-valued ecosystemic components. Similarly, the Concordance Table entry for Term and Condition 23 of Project Certificate No. 009 also makes no mention of the caribou mortality, relating to only the five non-valued ecosystemic components. Indeed, there is no mention of the caribou mortality that is directly attributable to project activities within the concordance table or elsewhere in the main annual report document; the death is only reported in Appendix C-2, the Wildlife Mitigation and Monitoring Program Compliance Report. It is unclear why the caribou mortality was omitted from the main annual report documents and is only related to Appendices.</p> <p>Section 3.4.3.4 in Appendix C-2 (Page 3-21) and Appendix G (to Appendix C-2, no page numbers available) also relate an incident involving a caribou “near a blast site” that required “brief and intermittent deterrence” (Page 3-21) because blasting preparations were underway. It is not clear if the “blasting site” mentioned for this incident is the same as Quarry D, where the caribou mortality occurred. The type of deterrence is not recorded.</p> <p>According to the Wildlife Mitigation and Monitoring Plan (Page 15), a pre-blasting check for wildlife would occur prior to any blasting. No details are included regarding these pre-blast checks, such as who is performing the checks (e.g., a QEP or environmental manager), how far in advance of a blast would checking happen, frequency, duration, or the type of check (e.g., observers with binoculars, forward-looking infra-red (FLIR)). The narrative in Appendix C-2 states that three types of surveys for wildlife around blasting failed to detect the caribou – pre-blast environmental monitoring, quarry sweeps, and post-blast checks. Due to the mortality event, it is clear that these monitoring programs are inadequate, but no resolution or clearly described corrective actions are reported.</p>
<p>Recommendation/ Request</p>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Update or create SOP / blast protocols to include details regarding sweeps and integrate the corrective actions taken following this incident. • Provide detailed, specific information regarding all failures in mitigation which led to the mortality of the caribou. • Provide detailed, specific information regarding the mitigations that were implemented in the aftermath of the caribou mortality that will prevent this type of event from recurring.



	<ul style="list-style-type: none"> • Provide detailed, specific information in the Wildlife Mitigation and Monitoring Plan regarding how pre-blasting sweeps and checks are conducted. • Provide documentation that this caribou mortality was reported to NIRB within 48 hours of the event. • Provide documentation that this caribou mortality was reported to the local wildlife conservation office. • Report all wildlife mortalities in the main body of the annual report and not exclusively in the Appendices. • Report all wildlife mortalities in any concordance table(s) created for the annual report. • For all wildlife incidents and mortalities, provide clear information regarding the location where the events occurred and details of deterrence activities, if applicable. Include this information in annual reporting.
Agree or Disagree with Compliance Statement	Disagree. Due to the failure to exclude wildlife from a blasting area leading to the death of a caribou, failure to completely report the occurrence, and omission of the mortality from the main report documents, Project Certificate No. 003, Amendment 02, Term and Condition No. 25 and Project Certificate No. 009, Term and Condition No. 23 both appear to be non-compliant.
Importance	High

KIA-NIRB-15

Review Comment Number	KIA-NIRB-15
Subject/Topic	Monitoring Helicopters and Caribou Responses to Helicopters
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Table 1, Pages iii to vi ○ Section 2.3, Pages 2-8 to 2-10 ○ Section 2.3.3.1, Pages 2-9 to 2-10 ○ Section 3.5, Pages 3-22 to 3-26
Summary	The effects of helicopters on caribou is supported with camera data, but no clear link is provided showing camera images at the time of helicopter flights. In addition, there is no documentation that helicopters observed the prescribed vertical and horizontal distances between the aircraft and caribou or muskoxen.
Detailed Review Comment	The WMMP report (Page 2-10) states that wildlife cameras show that the highest number of caribou observations occurred within 2 km of the mine in July and August. The following sentence includes the



	<p>conclusion, <i>“it does not appear that helicopters are deterring caribou from utilizing habitat in this area.”</i> No details of the timing of flights, time stamps on camera images, or any other information to support this conclusion is provided. It is not clear how camera images taken at unstated times support this conclusion, as the camera detections could have occurred at times when aircraft were not active.</p> <p>The same section (Page 2-10) includes the statement that helicopter pilots, <i>“adhered to WMMP requirements to maintain a 300 metre (m) vertical and 600 m horizontal distance from caribou to reduce potential impacts during helicopter operation.”</i> However, no supporting information or documentation is provided regarding compliance or communication of these requirements to the helicopter pilots.</p> <p>Table 1 (Page iii) states in the column <i>“Comparison to Terms and Conditions, Predictions, and Program Objectives”</i> that helicopters also maintained 300 m vertical and 600 m horizontal separation from muskox. There is no mention of muskox in Section 2.3, and no mention of aircraft in Section 3.5 (Muskox, Pages 3-22 to 3-26).</p>
<p>Recommendation/ Request</p>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide more evidence from data collected from helicopters regarding horizontal flight paths and vertical flight statistical summaries regarding adherence to the distance requirements between helicopters and caribou during flights. • Please provide more documentation regarding adherence to the distance requirements between helicopters and muskoxen during flights
<p>Agree or Disagree with Compliance Statement</p>	<p>N / A</p>
<p>Importance</p>	<p>Low</p>

KIA-NIRB-16

<p>Review Comment Number</p>	<p>KIA-NIRB-16</p>
<p>Subject/Topic</p>	<p>Noise Monitoring</p>
<p>References</p>	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Section 7.2, Page 7-3 • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Section 2.4, Pages 2-10 to 2-12



<p>Summary</p>	<p>Proponent describes issues with noise monitoring program, specifically the wind noise interfering with blast noise. The procedures to address the issues are not adequately described to evaluate the program implementation. The proponent also suggests alternatives to the noise program, including abandonment. However, alternatives to the current program are not described.</p>
<p>Detailed Review Comment</p>	<p>The table presented in Section 7.2 (page 7-3) states that 2025 noise monitoring used “a SoundAdvisor,” and that the results were inconsistent due to ambient noise. The table also includes the statement, “Given these results and the historic pattern, it is recommended that the WMMP be updated 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.” Appendix C-2, Section 2.5 (Page 2-11) relates to the Noise Monitoring program. Section 2.4.2 states that a standard operating procedure (SOP) for noise monitoring of quarry blasts is provided as Appendix C (to Appendix C-2). The SOP indicates that data collection will start by collecting data 2.8 km from the blast, and if wind conditions are unfavorable (over 5 m/s), to progressively reduce the distance from the blast by 250 m until measurements are taken as close as 1 km from the blast site. It is unclear if the measurements were taken at one site at a time.</p> <p>Section 2.4.3 (Page 2-11) states that it was not possible to differentiate blast noise from wind and relates subjective observations from 2.8 km away from the blast site; it is not clear if the progressively closer measurements were taken as prescribed by the SOP. Section 2.4.4 states, “inconsistent results suggest that a local monitoring approach would be more effective for understanding potential impacts to caribou at the Mine.” Section 2.4.5 goes further, stating:</p> <p><i>“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. This management measure is more protective of caribou and dispenses with a time-consuming noise monitoring program and noise-based mitigation that has been proven impractical to monitor.”</i></p> <p><i>No details are provided for what constitutes a “local monitoring approach,” or if this approach is an alternative to the abandonment of the program as suggested in Section 2.4.5. It is also not clear how abandoning the monitoring program is “more protective of caribou.”</i></p> <p>Abandoning the noise monitoring program and relying on observations of caribou is particularly concerning because evidence contained within the WMMP report shows that caribou within</p>



	<p>blasting areas are not always noticed nor mitigated (see Comment KIA-NIRB-15).</p> <p>The SOP does not provide any information regarding analysis of sound files recorded by the monitoring device. It is not clear if the files generated by the monitoring device are conducive to sound editing tools that allow for isolation and elimination of background noise such as wind. There is no discussion regarding any advanced tools, if any tools or methods to reduce background noise were attempted on the recordings and their results, or if any methods to reduce wind noise were attempted in the field. It is not clear if the frequencies of the sound of the wind overlaps frequencies of blast noise such that sound editing tools would be unable to differentiate between the sounds. There is also no discussion on the potential to monitor noise on still days where wind is less of a factor.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please describe the 2025 noise monitoring program in more detail, including but not limited to the number of recordings attempted at each distance, dates of recordings, and results of sound analyses. • Please address whether noise monitoring could be conducted on still days with little wind (or wind below a threshold), after wind speed measurements are taken. • Please elaborate on what a “local monitoring approach” for noise that would replace the current program would entail and how it would be enacted. • Please describe how a “local monitoring approach” and/or abandoning the noise monitoring program would be more protective of caribou, as stated. • Please provide details of sound analysis, including all software used and editing tools or methods implemented to reduce ambient (wind) sounds. If sound editing tools that reduce wind noise are unsuitable, clearly explain why and describe any attempts to adjust the sound recording to reduce wind noise.
Agree or Disagree with Compliance Statement	N / A
Importance	Low

KIA-NIRB-17

Review Comment Number	KIA-NIRB-17
Subject/Topic	Revegetation Efforts
References	Hope Bay 2025 Annual Report (April 2026)



	<ul style="list-style-type: none"> • Section 7.4, Page 7-4 • Appendix A, Concordance Table (no page numbers appear in this Appendix) <ul style="list-style-type: none"> ○ Table for Project Certificate No. 009, Row for TC No. 18
Summary	No information is provided regarding any progressive reclamation efforts in 2025.
Detailed Review Comment	<p>Project Certificate No. 009, Term and Condition No. 18 states:</p> <p><i>“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.”</i></p> <p>Reporting requirements for TC 18: “The extent of progressive reclamation activities undertaken and measures of their success shall be summarized within the Proponent’s annual reports submitted to the NIRB.”</p> <p>The Concordance Table for Term and Condition 18 of Project Certificate 009 does not mention anything about progressive reclamation activities undertaken in 2025. The row includes a statement that natural regeneration is promoted, but no supporting details regarding revegetation trials or reclamation activities are included in the Annual Report.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide details of any progressive reclamation activities undertaken in 2025. If no progressive reclamation activities took place, please report that in annual reports and provide reasons why. • Please provide details of any revegetation trials in the Project area. If no such activities took place in 2025, provide details of where and when revegetation trials and results from other years can be located, including links. If no revegetation trials have occurred, please describe when they will take place.
Agree or Disagree with Compliance Statement	Disagree. Without sufficient detail regarding activities in 2025, even reporting if nothing was done, this term and condition cannot be fully evaluated.
Importance	Moderate



KIA-NIRB-18

Review Comment Number	KIA-NIRB-18
Subject/Topic	Sparrow Nest Disposition
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Section 2.5, Pages 2-12 to 2-15 ○ Table 2.5-1, Pages 2-14 and 2-15
Summary	A sparrow nest with eggs was located during preclearing surveys. The disposition of this nest is not disclosed in the report.
Detailed Review Comment	Section 2.5.3 (Page 2-13) states that eight nests were observed during preclearing surveys in 2025, and three of these nests were in the incubation stage. One of those nests, that of a sparrow species, contained four eggs when it was located according to Table 2.5-1 (Page 2-14). The text indicates that a different nest, that of an American robin, did not require a buffer, and a semipalmated plover nest had a 40 m buffer applied to it and it was monitored until fledging. The disposition of the sparrow nest is not described in the text nor in Table 2.5-1.
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide details regarding the sparrow nest, including but not limited to if it was buffered and if it was monitored until fledging. If it was not buffered and/or monitored, please provide reasoning. • Please ensure that dispositions are recounted in the annual report for all nests and dens found during preclearing surveys.
Agree or Disagree with Compliance Statement	N / A
Importance	Moderate

KIA-NIRB-19

Review Comment Number	KIA-NIRB-19
Subject/Topic	Camera Monitoring Sites
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Section 3.2.1, Pages 3-1 and 3-2



	<ul style="list-style-type: none"> ○ Section 3.3.1, Pages 3-3, 3-5, and 3-6 ○ Section 3.4.3.2, Page 3-15 to 3-17 ○ Section 3.5.3.1, Page 3-23
Summary	It is not clear how many and which cameras are monitoring potential wildlife attractants
Detailed Review Comment	<p>Section 3.2.1 (Page 3-1) briefly describes the camera monitoring program, stating there are 55 cameras used to monitor wildlife (there were 60 cameras, but 5 did not provide data and were omitted from analyses). This section also states that some cameras have site-specific monitoring objectives in addition to deployment within ‘Treatment,’ ‘ZOI,’ and ‘Control’ areas. It is not stated how many cameras are monitoring these site-specific objectives, nor within which zone the double-duty cameras fall. There are also two additional cameras installed near a culvert to monitor caribou use as a road crossing.</p> <p>Section 3.4.3.2 presents the results of the camera monitoring program as it pertains to caribou. This section implies that, in addition to the two cameras monitoring caribou crossings, there are two cameras deployed at either end of the TIA. Section 3.5.3.1, camera monitoring as it pertains to muskox, also lists the TIA cameras. Section 3.6.3.1, camera monitoring as it pertains to grizzly bear, lists three cameras in addition to the two at the TIA – two cameras at the waste management facility and one camera at the fish fence. It is not clear if there was any monitoring of other known wildlife attractant sites in 2025, such as the landfill or incinerator.</p> <p>It is also not clear in any of these sections if cameras monitoring specific sites are included in the reporting of the results from non-specific cameras.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please provide a table of camera locations and their purpose, including which cameras are deployed in a specific zone and are meant to monitor specific sites. • Please ensure that potential wildlife attractant sites, specifically human-generated waste and potential anthropogenic food sources, are monitored. • Please specify if results from site-specific cameras are included in the general camera results.
Agree or Disagree with Compliance Statement	N / A
Importance	Low



KIA-NIRB-20

Review Comment Number	KIA-NIRB-20
Subject/Topic	Caribou Collar Data Analysis
References	Hope Bay 2025 Annual Report (April 2026) <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Page 3-7
Summary	The method used for analyzing collar data does not account for autocorrelation.
Detailed Review Comment	In the report, it is stated that: <i>“The collar data are analyzed using kernel density analysis.”</i> However, one of the main assumptions of traditional Kernel Density Estimation (KDE) is that the input locations are independent. Collar data are typically highly spatially and temporally autocorrelated because successive GPS fixes from the same animal are not independent observations. This violates an important assumption of KDE. As a result, using KDE without accounting for autocorrelation may underestimate seasonal ranges. This is because the method may treat closely spaced, autocorrelated locations as more independent and informative than they are, which can lead to overly narrow or biased home-range estimates.
Recommendation/Request	The KIA requests the following: <ul style="list-style-type: none"> • Methods used in future years should account for autocorrelation. Products are currently being developed by KIA that include these corrections, and the outputs should be available to be shared with AEM for the next annual report.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-21

Review Comment Number	KIA-NIRB-21
Subject/Topic	Calving Season Date Ranges
References	Hope Bay 2025 Annual Report (April 2026) <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Page 3-8



Summary	The report assumed that the calving date range remained constant over time.
Detailed Review Comment	<p>In the report, it is stated that: <i>“For the purposes of this analysis, the calving season is defined as occurring from 6 June to 19 June (Nagy 2011).”</i> However, assuming a constant calving date range based on a study conducted in 2011 may create serious issues when estimating annual calving range. Calving timing can vary from year to year due to environmental conditions, herd-specific behavior, and changes in movement patterns. Therefore, applying a fixed date range across all years may overlook important temporal variation and lead to biased or inaccurate estimates of yearly calving ranges.</p> <p>There are existing methods that can be used to estimate calving date ranges directly from caribou movement data. These approaches allow researchers to identify year-specific calving periods for each herd rather than relying on a single fixed window. Hidden Markov models are one such method. They can be applied to caribou collar data to detect changes in movement behavior associated with calving and to estimate the timing of calving periods more accurately for each herd and year.</p>
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Calving season date ranges should be updated based on actual calving, rather than relying on dates from a 2011 study. Products are currently being developed by KIA that include these corrections, and the outputs should be available to be shared with AEM for the next annual report.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-22

Review Comment Number	KIA-NIRB-22
Subject/Topic	Identifying Calving Females
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Page 3-8
Summary	The report assumed a strict threshold of 5 km per day for identifying calving females.



<p>Detailed Review Comment</p>	<p>The report states: “Caribou occupying a restricted area with daily movement rates less than (<) 5 km were considered to be calving. In contrast, if daily movement rates of greater than (>) 5 km were observed leading into or out of the calving ground, this was interpreted as indicating that the individual was either still migrating or had concluded calving. Collar location data for these days were excluded from further analysis.”</p> <p>This method relies on a strict 5 km/day threshold to distinguish calving females from migrating or post-calving females. However, caribou movement does not necessarily follow such a fixed cutoff. Females moving less than 5 km/day may not be calving, while females moving more than 5 km/day may still have calved or may be moving because of disturbance or calf loss. The method does not account for variation in calving behavior. I am unsure whether an individual that moves 4.9 km/day can be reliably distinguished from an individual that moves 5.1 km/day. Both individuals could be calving females, neither could be calving, or only one of them may be calving. Therefore, a hard threshold is not suitable for this analysis. Additionally, daily movement estimates calculated from collar data are highly dependent on fix frequency. For example, movement may be underestimated for an individual with 4-hour fixes compared with an individual with 2-hour fixes.</p>
<p>Recommendation/ Request</p>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please indicate, based on the daily movement limit approach, how many females were classified as calving and how many were classified as non-calving. • KIA is currently working with movement data and using different methods to define calving dates. KIA may be able to present and share these dates with AEM before the next annual report.
<p>Recommendation/ Request</p>	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please indicate, based on the daily movement limit approach, how many females were classified as calving and how many were classified as non-calving. • KIA is currently working with movement data and using different methods to define calving dates. KIA may be able to present and share these dates with AEM before the next annual report.
<p>Agree or Disagree with Compliance Statement</p>	<p>N/A</p>
<p>Importance</p>	<p>High</p>



KIA-NIRB-23

Review Comment Number	KIA-NIRB-23
Subject/Topic	Dolphin and Union Herd Winter Range Locations
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Page 3-8
Summary	The report assumed that the winter date range remained constant over time.
Detailed Review Comment	<p>The report states: <i>“This analysis determines the amount of overlap between the Dolphin and Union winter range (8 December to 16 April) and the Study Area, both currently and historically.”</i> Similar to the comment provided regarding the calving date range, using a constant date range across years to map the winter range may lead to biased estimates because it does not capture annual variation in the start and end dates of the season.</p> <p>Winter range use can vary among years due to differences in environmental conditions, migration timing, snow and ice conditions, and movement patterns. Therefore, applying the same fixed winter-season window to all years may incorrectly include locations that are not part of the winter range or exclude locations that should be considered part of it.</p> <p>A more appropriate approach would be to estimate year-specific winter date ranges using collar data and movement patterns. Statistical movement models, such as Hidden Markov models or other movement-based classification methods, can be used to identify seasonal transitions and estimate the start and end dates of winter range used for each year. This would provide a more flexible and biologically meaningful estimate of winter range overlap with the Study Area.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • In future years, please use methods that estimates winter date ranges directly from caribou movement data, or use products currently being developed by KIA that aim to include these corrections.
Agree or Disagree with Compliance Statement	N/A
Importance	High



KIA-NIRB-24

Review Comment Number	KIA-NIRB-24
Subject/Topic	Seasonal Ranges Compared to the Study Area
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Figure 3.4-1 50% kernel density estimates of the calving home range of Beverly and Ahiak sub-populations collar data, 2012 to 2024 and 2025 ○ Figure 3.4-2 95% kernel density estimates of the calving home range of Beverly and Ahiak sub-populations collar data, 2012 to 2024 and 2025 ○ Figure 3.4-3 50% kernel density estimates of the winter range of Dolphin and Union herd collar data, 2001 to 2024 and 2025 ○ Figure 3.4-4 95% kernel density estimates of the winter range of Dolphin and Union herd collar data, 2001 to 2024 and 2025
Summary	It would be more informative if the maps showed yearly ranges rather than comparing only 2025 with the historical range.
Detailed Review Comment	<p>In their current form, the maps only compare the 2025 ranges with all previous years combined. This type of analysis does not show whether seasonal ranges have shifted gradually over time or whether changes occurred in specific years.</p> <p>Combining all previous years into a single historical range may mask important annual variation and obscure potential trends in range use. A more informative approach would be to present yearly seasonal ranges, or at least ranges grouped by time period, to better evaluate whether there has been a directional shift, contraction, expansion, or other change in seasonal distribution over time.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Yearly ranges for the past 10–15 years should also be shown instead of presenting a single combined range for 2001–2024. Products are currently being developed by KIA that may fulfill this request and should be available to be shared with AEM for the next annual report.
Agree or Disagree with Compliance Statement	N/A
Importance	High



KIA-NIRB-25

Review Comment Number	KIA-NIRB-25
Subject/Topic	Kernel Density Estimation
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Figure 3.4-1 50% kernel density estimates of the calving home range of Beverly and Ahiak sub-populations collar data, 2012 to 2024 and 2025 ○ Figure 3.4-2 95% kernel density estimates of the calving home range of Beverly and Ahiak sub-populations collar data, 2012 to 2024 and 2025 ○ Figure 3.4-3 50% kernel density estimates of the winter range of Dolphin and Union herd collar data, 2001 to 2024 and 2025 ○ Figure 3.4-4 95% kernel density estimates of the winter range of Dolphin and Union herd collar data, 2001 to 2024 and 2025
Summary	Kernel density estimation should be based on individuals rather than pooled fixes.
Detailed Review Comment	<p>In the provided maps (and in the methods), the settings used to run the kernel density estimation are not provided. However, based on the shape of the polygons, the estimated ranges seem to be overly simplified.</p> <p>As noted in the previous comments, collar data can violate the assumptions of regular kernel density estimation because locations from the same individual are often autocorrelated. As a result, standard KDE can be strongly influenced by the temporal structure of collar data.</p> <p>Additionally, based on the limited methodological information provided, my understanding is that all points for a given season were pooled together before applying KDE. This approach can produce biased estimates because individuals with more locations or more frequent fixes may receive greater weight in the analysis. In other words, the resulting range may reflect sampling intensity more than true population-level space use.</p> <p>A more reliable approach would be to first estimate the home range or seasonal range for each individual, preferably using autocorrelated kernel density estimation, and then average or summarize these individual-level estimates to obtain a population-level range. The current approach seems closer to producing a point-density surface,</p>



	which is difficult to interpret biologically as a population-level seasonal range.
Recommendation/ Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • In future, seasonal ranges should be mapped without violating the assumptions of the method used. New spatial seasonal range products currently being developed by KIA include the corrections needed, and they should be available to share with AEM prior to the next annual report review. • Home-range layers should be created at the individual level first and then summarize them at the population level. Products are currently being developed by KIA that include these corrections, and the outputs should be available to be shared with AEM for the next annual report. When decisions are made regarding settings or assumptions, please provide the details in the report, such as the settings used for the KDEs.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-26

Review Comment Number	KIA-NIRB-26
Subject/Topic	General Editing
References	<p>Hope Bay 2025 Annual Report (April 2026)</p> <ul style="list-style-type: none"> • Appendix A, Concordance Table • Appendix C-2, 2025 Wildlife Mitigation and Monitoring Program Compliance Report <ul style="list-style-type: none"> ○ Appendix G (to Appendix C-2), Wildlife Interactions, Incidents, and Mortalities Recorded at the Mine, 2025 (No page numbers appear in this Appendix)
Summary	Some minor editing suggestions to improve the document
Detailed Review Comment	<p>Some sections or subsections of the report, such as Appendix A, which consists of a series of large concordance tables, do not appear to include page numbers. Lack of page numbers makes it difficult to reference issues or to communicate with others where specific information may be found.</p> <p>Appendix G to Appendix C of the annual report includes reference to an acronym, "STP." This acronym is not defined in the text nor in the Glossary.</p>
Recommendation/	The KIA requests the following:



Request	<ul style="list-style-type: none"> • Please ensure that all pages of the report have page numbers. • Please ensure that all acronyms are defined within the Glossary and at their first usage in text, captions, and tables.
Agree or Disagree with Compliance Statement	N/A
Importance	Low

KIA-NIRB-27

Review Comment Number	KIA-NIRB-27
Subject/Topic	Care and Water Management / Infrastructure Development Status
References	Care and Water Management / Infrastructure Development Status
Summary	Sump 1c, a component designed to manage water from the Madrid Waste Rock Storage Facility (WRSF), was not initiated until Q1 2026, meaning the contact water containment system was incomplete during the 2025 reporting period.
Detailed Review Comment	<p>Gap/Issue: The document notes that work to improve water management from the Madrid WRSF was initiated in Q1 2025 and will continue throughout 2026, with work on Sump 1c only being initiated in Q1 2026.</p> <p>Disagreement with Report Conclusion: If the 2025 Annual Review concludes that contact water runoff from the Madrid WRSF was fully controlled, stabilized, or mitigated during the 2025 freshet/reporting year, that conclusion is premature.</p> <p>Reasons for Disagreement: The physical infrastructure required to capture potential bypass water (Sump 1c) did not exist during 2025. There is a lack of supporting data demonstrating whether any uncontrolled seepage or bypass occurred during the 2025 freshet prior to the initiation of Sump 1c.</p>
Recommendation/Request	The Proponent should provide historical water quality and water level monitoring data specifically around the Madrid WRSF from the 2025 freshet to prove containment verification. Additionally, the Proponent must clarify how contact water bypass was managed in 2025 while Sump 1c was non-existent.
Agree or Disagree with Compliance Statement	Disagree (if the 2025 report claims full water containment compliance at Madrid WRSF).



Importance	High
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KIA-NIRB-28

Review Comment Number	KIA-NIRB-28
Subject/Topic	Tailings Impoundment Area (TIA) / Structural Water Management
References	Care and Maintenance Plan - Section 2.3 (Tailings Impoundment Area, P.25)
Summary	The Care and Maintenance Plan states that an alternative water management strategy—requiring a new spillway and internal berms—is necessary for the TIA to remain in regulatory compliance for environmental discharge.
Detailed Review Comment	<p>Gap/Issue: The text explicitly notes that <i>"Water management will require a new spillway and internal berm(s) at the TIA to address an alternative water management strategy for mine water and for the TIA water to remain in regulatory compliance for discharge to the receiving environment."</i></p> <p>Disagreement with Report Conclusion: If the 2025 Annual Review assumes the TIA was operating under a stable, long-term compliant framework, it fails to capture the underlying risk that triggered the need for these new structures.</p> <p>Reasons for Disagreement: The need for a new spillway and internal segregation berms indicates that the 2025 water management configuration was insufficient to guarantee ongoing regulatory compliance under expected care and maintenance water-load conditions.</p>
Recommendation/Request	The Proponent must present the updated Water and Load Balance Model predictions that prompted this structural intervention. Provide clarity on whether the TIA neared freeboard or water quality thresholds at any point in 2025 before this "alternative strategy" was introduced.
Agree or Disagree with Compliance Statement	Disagree (with any statement implying the 2025 TIA configuration was adequate for long-term sustainable compliance without modifications).
Importance	High



KIA-NIRB-29

Review Comment Number	KIA-NIRB-29
Subject/Topic	Air Quality and Noise Monitoring Baselines
References	Care and Maintenance Plan - Section 2.6.2 (Doris Mill, P.27) and Figure 4.1 (Planned Activities, P.39)
Summary	The complete dismantling of the Doris Mill in 2025 may have introduced heavy industrial demolition variables that may skew standard "Care and Maintenance" environmental baseline data.
Detailed Review Comment	<p>Gap/Issue: In 2025, the Doris Mill was fully dismantled, and major process equipment was removed and shipped off-site.</p> <p>Disagreement with Report Conclusion: If the 2025 Annual Review interprets air quality (dustfall), noise, or wildlife interaction data as representative of a passive "Care and Maintenance" state; the conclusion is invalid.</p> <p>Reasons for Disagreement: Massive mechanical and structural dismantling activities generate localized dust, ambient noise, and heavy transport movements (barge loading) that mimic active operations rather than temporary closure. Monitoring datasets must isolate these project-specific impacts.</p>
Recommendation/ Request	Request the Proponent explicitly correlate 2025 dustfall, particulate monitoring, and ambient noise datasets with the specific timeline of the 2025 mill dismantling activities to ensure demolition impacts are transparently accounted for.
Agree or Disagree with Compliance Statement	Agree with Monitoring, disagree with data interpretation if baselines were not isolated.
Importance	Moderate

KIA-NIRB-30

Review Comment Number	KIA-NIRB-30
Subject/Topic	Terrestrial Contact Water Infrastructure
References	Care and Maintenance Plan - Section 2.2.1 and 2.2.2 (Waste Rock and Ore Stockpiles, P.24)



Summary	Although Pad U was constructed in 2025, its associated Contact Water Pond (CWP) was delayed into early 2026, creating a temporary gap in localized runoff containment infrastructure
Detailed Review Comment	<p>Gap/Issue: The plan reveals that Pad U was built in 2025, but ore stockpiling from Doris and Madrid underground exploration was deferred to early 2026 "upon completion of the associated Pad U CWP."</p> <p>Disagreement with Report Conclusion: Any conclusion in the 2025 Annual Review suggesting that new surface development footprints were fully supported by operational runoff controls during the reporting year is inaccurate for Pad U.</p> <p>Reasons for Disagreement: Pad U was physically present in 2025, meaning its footprint altered local terrain and drainage characteristics before its dedicated CWP was fully operational to capture runoff.</p>
Recommendation/ Request	Provide information regarding the interim runoff mitigation and sedimentation control measures applied to the Pad U footprint during its 2025 construction phase, prior to the early 2026 completion of its CWP
Agree or Disagree with Compliance Statement	Disagree
Importance	Moderate

KIA-NIRB-31

Review Comment Number	KIA-NIRB-31
Subject/Topic	Aquatic Effects and Program Scope
References	Care and Maintenance Plan - Document Revisions (P.ii) and Table 3-1 (P.33)
Summary	Reference to the Fisheries Authorization Monitoring program was removed from the active monitoring framework because its required duration concluded, which bounds the timeline of available aquatic impact conclusions.
Detailed Review Comment	Gap/Issue: The revision logs note that reference to the Fisheries Authorization Monitoring was removed from Table 3-1 because the mandated monitoring has been completed.



	<p>Disagreement with Report Conclusion: Conclusions regarding long-term fisheries impacts must be explicitly qualified if active field programs under that specific authorization are no longer generating data during Care and Maintenance.</p> <p>Reasons for Disagreement: While regulatory obligations may be legally "complete," the transition into temporary closure can introduce distinct hydrologic and chemical variables that differ from the operational period during which the fisheries program was designed.</p>
Recommendation/Request	Confirm how any lingering data endpoints or commitments from the completed Fisheries Authorization Monitoring program have been integrated into the ongoing Aquatic Effects Monitoring Plan (AEMP) to ensure no long-term blind spots exist.
Agree or Disagree with Compliance Statement	Agree with the administrative modification but require context validation.
Importance	Low

KIA-NIRB-32

Review Comment Number	KIA-NIRB-32
Subject/Topic	Absence of sediment quality, benthic invertebrate and chlorophyll a (biomass) sampling in Windy Lake
References	2025 Aquatic Effects Monitoring Program – Annual Report. P.4
Summary	No data or analysis are presented for sediment quality, benthic invertebrate parameters or phytoplankton biomass (chlorophyll a) for Windy Lake.
Detailed Review Comment	<p>The Hydrology Compliance Monitoring memo (p. 217) states that Windy and Doris Lakes watersheds are currently being monitored to evaluate Mine-related effects on the freshwater environment. Also, Construction and Operations phases triggered water level monitoring at Glenn Lake, into which Windy Lake empties; no data or analysis are provided for the three parameters:</p> <ul style="list-style-type: none"> • sediment quality • benthic invertebrate parameters • phytoplankton biomass (chlorophyll a)
Recommendation/Request	An explanation should be provided regarding the absence of monitoring these three parameters at Windy Lake.



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Agree or Disagree with Compliance Statement	Disagree – additional information required to confirm the presence or absence of potential effects on lower trophic levels.
Importance	Moderate

KIA-NIRB-33

Review Comment Number	KIA-NIRB-33
Subject/Topic	Use of professional judgment
References	2025 Aquatic Effects Monitoring Program – Annual Report. Pp. 28 & 29, 32.
Summary	Using professional judgment rather than statistical analysis to assess the potential cause of an effect, yet no indication of how professional judgement is used is provided.
Detailed Review Comment	<p>The report states the “statistical assessments, graphical assessments and professional judgment were used in the evaluation of effects to assess whether an effect occurred and if action level conditions would be triggered by the Response Framework.” If an effect was detected based on statistical and graphical assessments, professional judgment was used to interpret supporting data to assess the potential cause. Factors that are unrelated to Mine activities could influence the detection of a temporal change. Local differences in meteorological conditions, runoff or other naturally variable inputs could also influence changes over time.</p> <p>The report implies that these factors are assessed using professional judgment; however, there could be a tendency to explain away an effect based on professional judgment or to explain the effect incorrectly.</p> <p>The report goes on to reference the Response Framework, which outlines the steps to determine if an effect is Mine-related; however, no mention is made of whether or how professional judgment is used with this tool.</p>
Recommendation/ Request	The report should explain how professional judgment is being used and provide rationale for why this is an acceptable and scientific approach. If this approach is not being used per the Response Framework, an explanation should be provided for why professional judgment is mentioned as a tool.



Agree or Disagree with Compliance Statement	NA – additional information required to evaluate how professional judgement has been used.
Importance	Moderate

KIA-NIRB-34

Review Comment Number	KIA-NIRB-34
Subject/Topic	Benthic invertebrate analysis
References	2025 Aquatic Effects Monitoring Program – Annual Report. P. 34
Summary	No mention is made of taxa richness or Simpson’s evenness index, which assesses the species diversity and quality. An increase in density was seen as a positive effect, but this may not be true if the taxa have shifted to a profile of tolerant species.
Detailed Review Comment	<p>The AEMP assesses the benthic invertebrate community as it relates to density, family richness, family evenness (relative abundance) and the Bray-Curtis Index, which compares similarities between two communities. No significant differences were observed over time or when compared to the reference lake.</p> <p>Family evenness and family richness provide a degree of information as it relates to the health of the benthic invertebrate community; however, calculation of EPT index (Ephemeroptera, Plecoptera, Trichoptera), Hilsenhoff and Shannon Diversity Index provide an indicator of the overall health of the benthic community and subsequently the sampled waterbody. In particular, the Shannon Diversity Index quantifies species diversity by combining species richness and evenness into a single numerical value.</p> <p>These indices have not been calculated as part of the benthic invertebrate sampling program; therefore, the health of the community cannot be determined. Also, an increase in density may be a negative impact if it is comprised of pollution tolerant species.</p>
Recommendation/ Request	Consideration should be given to calculating these indices to identify the overall health of the benthic invertebrate community and associated lake. At the very least, calculation of the Shannon Diversity Index should be completed.
Agree or Disagree with Compliance Statement	Disagree – additional information required to confirm the presence or absence of potential effects on lower trophic levels.
Importance	Moderate



KIA-NIRB-34

Review Comment Number	KIA-NIRB-34
Subject/Topic	Chloride, fluoride and boron concentrations in exposure lakes are above those measured in the reference lake.
References	2025 Aquatic Effects Monitoring Program – Annual Report pp. 56, 59, 81.
Summary	Chloride, fluoride and boron concentrations in Doris, Patch and Windy Lakes are significantly higher than reference lake for both open-water and under-ice.
Detailed Review Comment	Chloride, fluoride and boron concentrations are below the benchmark, in Doris, Patch and Windy Lakes, but they are consistently significantly higher than the reference lake for both open-water and under-ice conditions. The AEMP notes that the concentrations are also not high enough to meet the Low Action Level criteria, but no attempt has been made to explain the difference between the reference and exposure lakes.
Recommendation/ Request	The concentrations of these three elements have not changed significantly, but it would be useful to know why the concentrations are so different when reference lakes are intended to reflect the characteristics of the impact lakes.
Agree or Disagree with Compliance Statement	NA – additional information required to evaluate potential project related effects on surface water quality in project lakes.
Importance	Low

KIA-NIRB-35

Review Comment Number	KIA-NIRB-35
Subject/Topic	Community Involvement Plan
References	Hope Bay Project 2025 Socio-economic Monitoring Program Report, Page 1-6; Appendix A
Summary	The TMAC Community Involvement Plan (2016) provides a framework for community involvement in the Hope Bay Project through job creation, economic growth and training opportunities, to fulfill Condition 32 of the Amended Project Certificate. Appendix A in the SEMR states that as part of this plan Agnico Eagle (current owner) will maintain communications with Kitikmeot communities, including sharing information on labour needs, training opportunities, skills



	and qualifications needed for employment, and other related information.
Detailed Review Comment	As described in the Community Involvement Plan, Agnico Eagle needs to improve its communications with KIA staff even when in Care and Maintenance. Specifically, the Socio-Economic Monitoring plan showed: 1) little to no collaboration with KIA when planning committee meetings; 2) Agnico Eagle has not provided information promptly to KIA; instead, KIA has to wait for the next Implementation Committee Meeting which are held annually because the Project is in Care and Maintenance. This means that the KIA has been waiting months to obtain critical information.
Recommendation/ Request	KIA requests further discussions with Agnico Eagle about how communications can be improved going forward, including a process whereby Agnico Eagle provides requested information in a timely manner to KIA.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-36

Review Comment Number	KIA-NIRB-36
Subject/Topic	Inuit and Kitikmeot Employment
References	Hope Bay Project 2025 Socio-economic Monitoring Program Report, Figure 1.2-1
Summary	Kitikmeot Inuit and other Inuit employment information was provided for both employees and contractors in the 2025 report. The report indicates that about 7.5% of the total workforce was Inuit in 2025, and about 4.5% of the Inuit workforce was from Kitikmeot (Figure 1.2-1).
Detailed Review Comment	These employment numbers remain low. KIA has raised concerns about the low numbers of Kitikmeot Inuit and other Inuit employees in its review of past Annual Reports. KIA refers to Agnico Eagle to many recommendations and concerns raised in their comments from 2023.
Recommendation/ Request	KIA asks Agnico Eagle to be deliberate and transparent about the steps being taken to significantly improve Kitikmeot Inuit and other Inuit employment as Hope Bay comes out of Care and Maintenance to be comparable with the higher Inuit employment numbers it has at its other mines in Nunavut (e.g., Meadowbank).



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Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-37

Review Comment Number	KIA-NIRB-37
Subject/Topic	Kitikmeot Employment
References	Hope Bay Project 2025 Socio-economic Monitoring Program Report, Page 17
Summary	KIA notes that most Inuit workers (employees and contractors) in 2025 come from Gjoa Haven (14) and Cambridge Bay (12).
Detailed Review Comment	What are the reasons behind this statistic? What are the barriers to hiring Inuit from other Kitikmeot communities?
Recommendation/Request	KIA asks Agnico Eagle to work to increase the numbers of Inuit employees from other Kitikmeot communities.
Agree or Disagree with Compliance Statement	N/A
Importance	High

KIA-NIRB-38

Review Comment Number	KIA-NIRB-38
Subject/Topic	High School Achievement Awards
References	Hope Bay Project 2025 Socio-economic Monitoring Program Report, Page 42
Summary	During Care and Maintenance, high school achievement awards that recognize traditional knowledge and academic excellence were paused.
Detailed Review Comment	KIA believes that this program remains beneficial to increase the interest of students in mining even if the mine is in Care and Maintenance, and this is particularly relevant now when the mine is planning to resume production in the near future.
Recommendation/Request	KIA asks that the high school achievement awards be reinstated as soon as possible.



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Agree or Disagree with Compliance Statement	N/A
Importance	Moderate

KIA-NIRB-39

Review Comment Number	KIA-NIRB-39
Subject/Topic	Inuit Employment - turnover
References	Hope Bay Project 2025 Socio-economic Monitoring Program Report, Page 24 (Figure 1.5-1)
Summary	Inuit Employment - turnover
Detailed Review Comment	Turnover of Inuit employees has declined since 2024 (19% in 2024 to 11% in 2025). However, turnover for Inuit employees is still nearly triple the rate of turnover for non-Inuit employees.
Recommendation/Request	As the Project advances towards resuming production, KIA would like to see Agnico Eagle working to reduce turnover for Inuit employees, such as through updated recruitment and retention strategies.
Agree or Disagree with Compliance Statement	KIA requests that Agnico Eagle actively works to reduce turnover for Inuit employees, such as through updated recruitment and retention strategies, and facilitated by regular communications with KIA to share updated employment and training information.
Importance	High

KIA-NIRB-40

Review Comment Number	KIA-NIRB-40
Subject/Topic	Training
References	Hope Bay Project 2025 Socio-economic Monitoring Program Report, Page 28
Summary	In 2025, 227 hours of on-the-job training were delivered to Inuit.
Detailed Review Comment	This number of training hours for Inuit is very low (2.3% of all training hours delivered, where Inuit employees are approximately 7.5% of the total workforce).
Recommendation/Request	KIA repeats its request made in 2023 that Agnico Eagle get ahead of the curve on training so that when Care and Maintenance is over, Agnico Eagle has an improved chance to maximize Inuit employment.



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Agree or Disagree with Compliance Statement	N/A
Importance	Moderate

KIA-NIRB-41

Review Comment Number	KIA-NIRB-41
Subject/Topic	Employment Level
References	Hope Bay Project 2025 Socio-economic Monitoring Program Report, Page 30 – Figure 1.9-1
Summary	<p>In 2025, Inuit employment was comprised of nearly all unskilled roles (95%). Only one Inuit worker was in a skilled role, and one Inuit worker was in a management role. The percentage of unskilled Inuit workers has increased during Care and Maintenance.</p> <p>Agnico Eagle notes that “the range of duties performed by Inuit reflects the labour force experience, the availability of training programs within the region, on-the-job training, and Project needs. Agnico Eagle expects Inuit representation across skill levels to evolve as Inuit obtain relevant knowledge, skills, and experience, and as the Project increases onsite activities and returns to production” (page 30).</p>
Detailed Review Comment	KIA understands that the Project was in Care and Maintenance; however, KIA would like to see the percentage of Inuit in skilled positions and supervisory positions increase.
Recommendation/Request	Please describe how Agnico Eagle’s plans to increase the percentage of Inuit in skilled and management positions as the project advances towards resuming operation.
Agree or Disagree with Compliance Statement	N/A
Importance	Moderate

