

Interested Party:	GN	Rec No.:	GN-AR-01
Re:	Project Certificate No. 003 T&C 25-27 and Project Certificate No. 009 T&C 19, Commitment 46 (2018)		

Request Made by Interested Party:

The GN requests that the NIRB direct the Proponent to initiate a review of the WMMP and seek written feedback from the GN Department of Environment, given its mandate for wildlife protection.

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

Agnico Eagle's Response to Request:

As noted by the reviewer, Agnico Eagle is required under Term and Condition 27 of Project Certificate No. 003, Amendment 02, to periodically update the Wildlife Mitigation and Management Plan (WMMP). The WMMP was last updated in April 2025 to incorporate changes discussed and agreed upon with the IEAC and KitlA, along with general site updates. No additional updates were required for the 2026 reporting period.

Interested Party:	GN	Rec No.:	GN-AR-02
Re:	Project Certificate No. 003 T&C 25-27 and Project Certificate No. 009 T&C 19, Commitment 48 (2018)		

Request Made by Interested Party:

The GN requests that the Proponent undertake the following:

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

Agnico Eagle's Response to Request:

Response to bullets 1) and 2):

The camera program was designed as a collaborative process between the Proponent, the Government of Nunavut Department of Environment (GN DOE) and the Kitikmeot Inuit Association (KitIA) in February 2016 following comments on a preliminary camera program initiated in 2011. The program includes cameras in bands at various distances from the Mine, in test, Zone of Influence (ZOI) and control areas. Consideration was made during the design process to matching habitat type at each camera location as much as possible. Note that there is an underlying habitat difference within the Hope Bay Greenstone Belt, which is an approximately 4-6 km wide band where the mine is located, that alters the underlying habitat quality as determined by habitat suitability mapping included in the Madrid-Boston Amendment FEIS. This underlying habitat difference is assessed as part of the analysis of camera data. Also note that there are cameras placed on Mine roads to monitor road crossing by caribou and camp infrastructure to monitor for attraction of scavengers and predators.

The request to map important wildlife areas within the RSA to inform the camera program is not possible; because there are no important wildlife habitat areas identified by agencies in the RSA, including the Nunavut Planning Commission areas for caribou, polar bears or other species, nor are there any important bird areas identified by Environment and Climate Change Canada, wetlands identified by RAMSAR or conservation areas identified by the KitIA.

Response to bullet 3):

The camera program is designed to test the predictions of the Madrid-Boston FEIS and is discussed relative to these predictions in the annual report. If the results of the monitoring programs agree with the

predictions of the FEIS, then no additional mitigation is required. If the monitoring programs reveal unexpected outcomes, then Agnico Eagle will apply the mitigation hierarchy and adaptive management principles. Given the nature of natural systems, unexpected outcomes cannot be reliably predicted and so it is not possible to have a structured response plan for every possible unexpected result of the monitoring plan.

Interested Party:	GN	Rec No.:	GN-AR-03
Re:	Project Certificate No. 003 T&C 25-27 and Project Certificate No. 009 T&C 19		

Request Made by Interested Party:

The GN recommends that the Proponent:

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

Agnico Eagle's Response to Request:

Additional ground-truthing using genetic based verification is not warranted. Collecting these data would be very costly and would not materially affect how mitigation for caribou is carried out on site, nor is there reason to question the classification of herds based on the trail camera photos being made by the Inuit members of the IEAC.

The Madrid-Boston FEIS stated that both mainland (Beverly herd) and island caribou (Dolphin and Union herd) occur in the RSA, sometimes at the same time of year. This information was drawn from Traditional Knowledge reports provided by the KIA, the results of caribou workshops with Inuit Elders and the results of analysis of satellite collar data. The mitigations included in the WMMP apply to all caribou, regardless of herd. These mitigations are informed by over 20 years of data indicating when caribou are more likely to occur in the RSA and Mine site.

The IEAC is made up of Inuit who are familiar with the area surrounding the Mine. Agnico Eagle presents the results of ongoing monitoring programs to the IEAC on an annual basis and the IEAC sometimes ask for additional analyses or field studies. In the IEAC Spring 2023 meeting, IEAC members requested that an analysis be conducted to classify whether caribou recorded on trail cameras were mainland or island caribou. Members noted that mainland caribou are larger and darker than island caribou. Based on this knowledge a workshop was hosted to develop a classification key and determine whether it's possible to reliably identify caribou in photos. In the IEAC Fall 2023 meeting, the 'Caribou Identification Guide' was developed along with a workshop to practice the classification based on physical characteristics. The workshop was successful in using the guide to classify the caribou. If during the camera analysis the herds could not be determined, the photos would be shared with the IEAC to classify.

There is no requirement in the Project Certificate to identify caribou to herd in the camera monitoring program, nor have there been any commitments made to the GN to do so. The classification program is conducted to satisfy requests from the IEAC. Therefore, no additional ground-truthing or DNA testing programs are warranted at this time.

Interested Party:	GN	Rec No.:	GN-AR-04
Re:	Project Certificate No. 003 T&C 25-27 and Project Certificate No. 009 T&C 20, Commitments 46 & 49		

Request Made by Interested Party:

The GN requests that the Proponent undertake the following:

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

The GN requests that the NIRB clarify what direction was given to the Proponent, and when, to discontinue the snow track surveys.

Agnico Eagle's Response to Request:

Response to bullet 1):

Yes snowfall during the 2020-2025 period are within norms, as presented in the Atmospheric Compliance Monitoring Program Report submitted annually with NIRB report (Appendix C.1).

Response to bullet 2):

Should snowbank monitoring resume, Agnico Eagle will consider applicable recommendations from the Government of Nunavut. As noted in the 2023 WMMP Compliance Report, snowbank heights were consistently maintained at levels that did not hinder caribou movement, and following consultation with the IEAC in July 2024, the monitoring program was discontinued.

Response to bullet 3):

Agnico Eagle will engage with the GN regarding the development of the snow track survey program and will document the outcome of this engagement, including any agreed-upon survey approach, in the Wildlife Mitigation and Management Plan (WMMP) as applicable.

Response to bullet 4):

Agnico Eagle is unclear of the request, as there are no new roads are proposed. Roads that exist at Hope Bay and/or roads proposed but not built, have been through an environment assessment, which includes the collection of baseline studies. .

Interested Party:	GN	Rec No.:	GN-AR-05
Re:	Project Certificate No. 003 T&C 22, 25-27 and Project Certificate No. 009 T&C 19		

Request Made by Interested Party:

The GN requests that the Proponent undertake the following:

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

The GN recommends that the Proponent undertake the following:

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

Agnico Eagle's Response to Request:

Agnico Eagle does not agree with this recommendation. Agnico Eagle is not responsible for measuring the population sizes of grizzly bear or wolverine, so there is no reason to conduct a DNA sampling program.

Project Certificate #009, Term and Condition #19 indicates that the WMMP must include monitoring that considers the predicted effects on wildlife. The Madrid-Boston FEIS predicted that grizzly bears and wolverine may avoid the Mine due to disturbance or may be attracted to the Mine. The camera program is designed to test this prediction with cameras at different distances from the Mine to measure distribution, and cameras on buildings and the waste facility to measure attraction of scavengers. DNA hair-snag programs can not measure avoidance or attraction to a mine because a) sampling is not possible at the Mine site – it is unsafe to bait grizzly bears or wolverine to a sampling station at the Mine, and b) the grid-size of standard sampling programs of 10x10km is too large to test the prediction that bears would avoid the mine by 1-2 km.

Project Certificate #003 included a requirement to conduct a one-time population estimate for grizzly bear and wolverine as part of baseline studies for the Project. This study was conducted in 2010-2011, and is considered complete. This is also reflected in the NIRB's commentary within Project Certificate No.003, Term and Condition 22 (emphasis added):

*"The Proponent **has collected the baseline data** and continues to collect ongoing monitoring data and the results are incorporated as appropriate into the Proponent's Wildlife Mitigation and Management Plan."*

Further, as outlined in Section 3.1 of the NIRBs 2025 Annual Monitoring Report (NIRB 2025), Project Certificate No.003, Term and Condition 22 has been marked as complete and have no further updates.

Reference:

NIRB. 2025. 2025 Annual Monitoring Report Doris North Gold Mine and Hope Bay Belt Phase 2 File Nos. 05MN047 and 12MN036 Project Certificates 003 and 009. Issued November 26, 2025.

Interested Party:	GN	Rec No.:	GN-AR-06
Re:	Project Certificate No. 003 T&C 25-27, 29 and Project Certificate No. 009 T&C 4 & 22, Commitment 41 (2018)		

Request Made by Interested Party:

The GN requests that the Proponent undertake the following:

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

The GN recommends that the Proponent undertake the following:

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

Agnico Eagle's Response to Request:

Response to bullets 1), 2), and 3):

See KIA-NIRB-16

Response to bullet 4):

The feasibility and potential utility of seismic monitoring as a supplementary monitoring tool will be evaluated. Seismic monitoring may assist in confirming the occurrence and timing of blast-generated ground vibration where microphone records are affected by wind. However, it measures ground motion rather than airborne sound pressure and therefore cannot replace the airborne Lpeak measurement or directly assess the 96 dBZ criterion without a technically justified, site-specific basis. Its relevance to caribou protection, appropriate locations, measurement parameters, and practical implementation requirements would be considered as part of the feasibility assessment.

Interested Party:	GN	Rec No.:	GN-AR-07
Re:	Project Certificate No. 003 T&C 25-27 and Project Certificate No. 009 T&C 20, Commitment 45, 51 & 52 (2018)		

Request Made by Interested Party:

The GN requests that the Proponent undertake the following:

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

Agnico Eagle's Response to Request:**Response to bullet 1):**

Agnico Eagle considered the traffic data collected, and after discussions with the IEAC, it was not considered a point of concern. Traffic data was compared with existing studies, described below, and concluded that no additional measures are required.

No additional evaluation of wildlife protection measures were needed beyond continuing the mitigation already in place for wildlife encountering roads because the traffic levels at site are well below the levels at which studies have indicated levels impede wildlife movement. Daily averages were below 85 for camera 18 (Section 2.2.3 of the 2025 Wildlife Mitigation and Monitoring Program Compliance Report). As stated in the 2017 FEIS, studies in Alaska reported that caribou crossing of a pipeline road was impeded by traffic rates higher than 20 vehicles per hour (480 per day; Murphy and Curatolo 1984. Likewise, Murphy (1988) reported that caribou in the Kuparuk Oilfield in northern Alaska reported that road crossings by barren-ground caribou were only impeded once traffic rates were greater than 1 per minute (1,440 per day). Data collected from a variety of locations suggests that road traffic on the order of 4,000 to 10,000 vehicles per day begin to impose a barrier to movement to most large wildlife species, whereas roads with less than 1,000 vehicles a day are permeable to most species (Müller and Berthoud 1997).

For future years the data will be uploaded on a more consistent basis to reduce the likelihood of missed data.

Response to bullet 2):

The Terms and Conditions of the Project Certificate do not require collecting additional traffic data, such as date, time, location and speed. The traffic monitoring program only summarizes volume and composition of light-weight vehicles and heavy equipment information seasonally and annually. The road and traffic management on site stipulates a speed limit maximum of 40 km/h on all mine roads.

Interested Party:	GN	Rec No.:	GN-AR-08
Re:	Project Certificate No. 003 T&C 22, 25-27 Commitment 6 and Project Certificate No. 009 Commitment 60 & 61 (2018)		

Request Made by Interested Party:

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

Agnico Eagle's Response to Request:

Flight logs and associated tracking records are maintained by aviation service providers and currently include information required for operational and safety purposes. To the extent available, Agnico Eagle will continue to provide relevant flight data to support assessment of aviation activities associated with the Hope Bay Mine.

Interested Party:	KitIA	Rec No.:	KIA-NIRB-14
Re:	Insufficient pre-blast monitoring and failure to exclude wildlife from blasting area leading to a direct caribou mortality, and incomplete reporting of the event.		

Request Made by Interested Party:

The KIA requests the following:

- *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.*
- *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.*

Agnico Eagle's Response to Request:

Agnico Eagle recognizes the seriousness of wildlife mortality incidents and has carefully reviewed the circumstances surrounding this event. Although the investigation concluded that required pre-blast inspections had been completed and no wildlife was detected prior to blasting, the incident identified opportunities to further strengthen wildlife protection measures. As a result, additional controls have been implemented to reduce the likelihood of similar incidents occurring in the future. In response to KIA's specific points above, the following are provided:

Response to bullet 1):

The SOP has been updated to incorporate the corrective actions identified following this incident, main changes including full perimeter walk, use of drones if appropriate/feasible (weather dependent) and updated timing protocols (surveying closer to blast time).

Response to bullet 2):

- The investigation did not identify any failures related to the pre-blast wildlife mitigation measures required under the Wildlife Mitigation and Monitoring Plan (WMMP). Pre-blast environmental monitoring and quarry sweeps were completed prior to detonation and did not detect wildlife within the blast area. Post-blast inspections also did not identify wildlife immediately following the blast.
- Based on the available evidence, the most likely explanations are that the caribou entered the quarry following completion of the final pre-blast sweep but prior to detonation, or that the animal was concealed within quarry features or stockpiled material and was not visible to observers during pre-blast inspections. While the precise sequence of events could not be definitively determined, the investigation concluded that the fatality was consistent with blast-related effects.
- Although no specific procedural failures were identified, the incident demonstrated an opportunity to strengthen existing mitigation measures to further reduce the likelihood of wildlife entering or remaining undetected within the blast area immediately prior to blasting.

Response to bullet 3):

Following the incident, the Mine reviewed existing blast-area wildlife monitoring procedures and implemented the following enhancements:

- Increased focus on identifying potential wildlife concealment locations within the blast area, including blind spots created by quarry topography, stockpiles, and blasted rock.
- Implementation of a final wildlife sweep within 30 minutes of detonation to reduce the potential for wildlife to enter the blast area after inspections have been completed.
- Requirement to repeat wildlife sweeps if blasting is delayed by more than one hour following completion of the final inspection.
- Increased emphasis during pre-blast environmental inspections on scanning adjacent areas for approaching wildlife that may enter the blast zone.
- Review of environmental and blasting coordination procedures to ensure wildlife observations are communicated immediately prior to detonation.
- These measures are intended to minimize the likelihood of wildlife entering or remaining undetected within blast areas immediately before blasting activities occur.

Response to bullet 4):

The WMMP will be updated to provide additional detail regarding pre-blast wildlife inspections. The updated description will include:

- Timing of pre-blast wildlife inspections.
 - Roles and responsibilities of environmental personnel conducting inspections.
 - Areas to be inspected, including the blast footprint and surrounding buffer areas.
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- Procedures for inspecting quarry benches, stockpiles, rock piles, berms, and other locations where wildlife may be concealed.
- Requirements for final inspections immediately prior to blasting.
- Requirements for repeat inspections when blasting delays occur.
- Procedures for responding to wildlife observations and implementing blast delays, where required.

Response to bullet 5) and bullet 6):

Agnico Eagle confirms that the mortality was reported to NIRB, Government of Nunavut Department of Environment and KIA on August 28, 2025.

Response to bullet 7) and bullet 8):

Agnico Eagle notes that wildlife mortalities are described in the summary table directly following the Executive Summary in the 2025 annual compliance report. The table lists the number of mortalities, species, key details, and the corresponding report sections. In addition, wildlife mortalities were reported in the main body of the 2025 annual compliance report under subheadings titled Interactions, Incidents and Mortalities and supplemented with information in the appendices. Future reporting will continue to summarize wildlife mortality incidents in the main report and provide supporting details, as appropriate, in appendices.

Response to bullet 9):

Agnico Eagle agrees that for all future wildlife incidents and mortalities, we will continue to provide clear information regarding the location where the events occurred and details of deterrence activities.
