

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-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-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:	KitIA	Rec No.:	KIA-NIRB-19
Re:	Camera Monitoring Sites		

Request Made by Interested Party:

The KIA requests the following:

- *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.*

Agnico Eagle's Response to Request:

Appendix D of the WMMP Compliance Report (Appendix C.2) provides a table of all camera locations and treatments (Facilities, Treatment, ZOI, or Control) and specific monitoring targets for applicable cameras. Camera 18 is located at the Roberts Bay Waste Management Facility monitoring wildlife interactions with potential attractants. Camera 21 had been deployed to monitor the waste facility from 2019 to 2023, but there were no observations of bears investigating the facilities or acquiring any food rewards, and it was concluded that the waste facilities were not attracting predators. Camera 18 has remained at the waste management facility for ongoing monitoring, but camera 21 has since been relocated elsewhere. Additionally, cameras 1, 15, and 53 are located close to Doris Camp and provide monitoring of potential attractants associated with camp activities.

Cameras monitoring specific sites (road crossing ramps, under-road culvert, TIA, and facilities) are also included in the general camera results. As relevant for different species, results from targeted cameras are also presented separately (e.g., caribou detections at crossing ramps, grizzly bear detections on facilities cameras).

Interested Party:	KitIA	Rec No.:	KIA-NIRB-20
Re:	Caribou Collar Data Analysis		

Request Made by Interested Party:

The KIA requests the following:

- *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.*

Agnico Eagle's Response to Request:

If the KIA has experience with statistical methods that address autocorrelation, then please share the references with Agnico Eagle and we will determine if they substantially improve the reliability of the collar data analyses.

Interested Party:	KitIA	Rec No.:	KIA-NIRB-21
Re:	Calving Season Date Ranges		

Request Made by Interested Party:

The KIA requests the following:

- *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.*

Agnico Eagle's Response to Request:

As provided in the 2025 Wildlife Mitigation and Monitoring Program Compliance Report (Appendix C-2), the calving and non-calving rate of females was provided. Agnico Eagle is confident that the correct calving ground is being reported in the annual report.

It is acknowledged that the calving periods of certain caribou herds have been drifting earlier in the year compared to the dates published by Nagy 2011, presumably due to climate change. To address this shift, the analysis used to identify the calving grounds uses the movement rates of females to refine the established calving period.

Future analysis can expand that screening step to assess movement rates of caribou within a broader timeframe, further enhancing the reliability of the results by ensuring no calving females are missed.

Corrections for herd-specific annual seasonal periods provided in KIA products will be reviewed when made available to determine if they suitably improve the reliability of the collar data analyses.

Interested Party:	KitIA	Rec No.:	KIA-NIRB-22
Re:	Identifying Calving Females		

Request Made by Interested Party:

The KIA requests the following:

- *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.

Agnico Eagle's Response to Request:

In the current analysis, calving females were those within established seasonal periods (see response to **KIA-NIRB-21**) and excluding females that continued to move further than 5km per day. This analysis is conducted to identify where the calving range is located on an annual basis. Additional analyses, like what proportion of females are calving, is outside of the requirements for Agnico Eagle's monitoring program.

Corrections for herd-specific annual calving periods provided in KIA products will be reviewed when made available to determine if they suitably improve the reliability of the collar data analyses. Agnico Eagle would be pleased to work with the KIA to update the seasonal dates for caribou separate to the Wildlife Mitigation and Monitoring Program and include these dates in future monitoring reports.

Interested Party:	KitIA	Rec No.:	KIA-NIRB-23
Re:	Dolphin and Union Herd Winter Range Locations		

Request Made by Interested Party:

The KIA requests the following:

- *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.*

Agnico Eagle's Response to Request:

It is acknowledged that herd-specific seasonal periods can change over time but Agnico Eagle is confident that appropriate winter date ranges and movement data were utilized. The Hope Bay WMMP includes standard mitigation measures to protect caribou from disturbance. The WMMP includes additional mitigation measures if a caribou calving or post-calving range overlaps the Mine area (Section 2.2.2 WMMP). For this reason, additional focus is required to make sure the calculation of these locations is accurate and defensible.

Corrections for herd-specific annual seasonal periods provided in KIA products will be reviewed when made available to determine if they suitably improve the reliability of the collar data analyses.

Interested Party:	KitIA	Rec No.:	KIA-NIRB-24
Re:	Seasonal Ranges Compared to the Study Area		

Request Made by Interested Party:

The KIA requests the following:

- *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.*

Agnico Eagle's Response to Request:

Year-specific ranges have been presented in previous annual reports (e.g., the 2024 annual range was presented in the 2024 Annual Monitoring Report). Agnico Eagle understands that KIA is developing products that may support the presentation of annual ranges over longer periods and will consider incorporating this information into future annual reports, where appropriate.

Interested Party:	KitIA	Rec No.:	KIA-NIRB-25
Re:	Kernel Density Estimation		

Request Made by Interested Party:

The KIA requests the following:

- 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.*

Agnico Eagle's Response to Request:

It is acknowledged that developing KDEs at the individual level then summarizing them at the population level can reduce an excessive influence of individuals that contribute more locations. However, KDEs were intentionally applied to pooled collar locations to characterize herd-level seasonal space use rather than individual home ranges. This aligns with the primary objective of evaluating potential herd-level overlap with Project infrastructure.

Future reports will provide full details of settings used when fitting KDEs. Agnico Eagle can explore using the corrections developed by the KIA to determine if they suitably improve the reliability of the collar data analyses.
