Appendix 1

Meadowbank and Whale Tail Commitments

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
GN	MBK/WT	2019 Annual Report - NIRB - No 28 (Project Certificate 008) Agnico Eagle Mines (AEM) Ltd. (2019). Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7; Agnico Eagle Mines (AEM) Ltd. (2020). Meadowbank Mine 2019 Wildlife Monitoring Summary Report. Final. Appendix 52 of the Meadowbank Mine Annual Report; Baffinland Iron Mines Inc. (BIMC), (2019). Baffinland Iron Mines 2018 Annual Report to the Nunavut Impact Review Board; Environmental Dynamics Inc. (2018). Mary River Terrestrial Environmental Annual Monitoring Report; Government of Nunavut (GN). (2017). Final written submission for Agnico Eagle Mines' environmental impact statement for the proposed Whale Tail Pit project; Nunavut Impact Review Board (NIRB). (2017) Final hearing report, Agnico Eagle Mines Ltd. Whale Tail project. NIRB File No. 16MN056; Sabina (2020). Back River Project 2019 Annual Report. March 2020; Nunavut Impact Review Board (2019), Whale Tail Expansion Project Proposal Final Hearing Transcripts.	The 2019 Wildlife Monitoring Summary Report does not provide information on helicopter traffic for the approved Project and associated exploration activities despite a previous commitment made to the GN by the Proponent to do so. Helicopters are a potential source of disturbance for caribou and other wildlife. The intensity and distribution helicopter traffic should be monitored and reported in-order for reviewers to properly understand the disturbance footprint of the Project and associated exploration activities. Data on helicopter traffic should also be made available for wildlife effects monitoring studies. Importance to review and supporting rationale: During the NIRB's review of the Whale Tail Project, the GN noted concerns about the potential for helicopters to disturb wildlife such as caribou (GN 2017, Comment GN-10). Similar concerns were expressed by community members from Baker Lake (e.g. Whale Tail Final Hearing Transcripts, 2019, page 561) In response to these concerns, one of the commitments made by the Proponent to the Government of Nunavut (GN) during the NIRB's review of the Project was: "The Proponent shall revise the Project's TEMP to include a program to monitor and report helicopter traffic associated with the Whale Tail project (including existing Meadowbank infrastructure) and all associated exploration activities so that the spatial scale and intensity of this activity can be documented. This should include the collection and analysis of GPS track logs for all helicopter flights contracted by the Proponent." (NIRB 2017, Appendix B, Commitment #20) The commitment to monitor and report helicopter traffic was made by the Proponent in 2017. Since issuance of the project certificate, in March 2018, the Terrestrial Ecosystem Management Plan (TEMP) has been revised three times (versions 5, 6 and 7); along with a proposed draft version 8 created by the Proponent that is not supported by the GN. Despite this, the latest version still does not reflect this commitment. The GN has worked with the Proponent via the Terrestrial Advisory Group (TAG) and has repeatedly requested that this commitment be incorporated into the TEMP in accordance with term and condition #28 of the Project Certificate (NIRB Project Certificate 008). Term and Condition 28 states: "The Proponent shall maintain a Terrestrial Ecosystem Management Plan (TEMP) throughout all phases of the Project. The Plan shall include detailed monitoring, mitigation, and adaptive management measures for wildlife, with consideration for each Project activity predicted to affect wildlife, and with inclusion of specific triggers for mitigation and adaptive management intervention. The TEMP shall demonstrate consideration for all relevant commitments made by the Proponent throughout the Nunavut Impact Review Board's review of the Project." It is the GN's view that there has been ample time to fulfill the commitment to revise the TEMP and to provide the helicopter traffic monitoring results within Annual Wildlife Monitoring Reports. The failure to do so constitutes non-compliance with term and condition 28 of the Project certificate (008). The GN points out that several other projects in Nunavut have made similar commitments to report helicopter traffic and have fulfilled these commitments successfully and promptly (e.g. BIMC 2019; Sabina 2020). The GN also notes the Proponent's suggestion in the 2019 Wildlife Monitoring Summary Report that 3 days of helicopter traffic associated with the deployment of caribou satellite collars in the spring of 2018 may have affected the migration of caribou through the Project's regional study area (AEM 2020, Section 17). Although the report does not provide any evidence to substantiate this assertion, it illustrates the Proponent's view that helicopter traffic is potentially a significant source of disturbance to wildlife; a fact that is at odds with the company's reluctance to fulfill monitoring and reporting requirements for helicopters.	The GN offers the following recommendations with respect to this issue: 1. That the Board direct the Proponent to immediately revise the Project's TEMP to reflect commitments made throughout the Nunavut Impact Review Board's review of the Project, as per term and condition 28 of the Project Certificate. 2. That the Board direct the Proponent to revise the 2019 Wildlife Monitoring Summary Report by adding information on helicopter traffic that includes the following elements: 2.1. Tables documenting the frequency of helicopter flights associated with the Whale Tail project (including existing Meadowbank infrastructure) and all associated exploration activities. Table should present flight frequencies according to the seasons defined for caribou in the TEMP v. 7. 2.2. Maps showing the GPS tracks of all helicopter flights reported in the afore-mentioned tables. Maps to be presented according to the seasons defined for caribou in the TEMP v. 7. 2.3. Tables and maps showing the seasonal frequency and distribution of flights with cruising altitudes under 300 m; the mandatory minimum specified in the TEMP for avoidance of caribou (AEM 2019, Table 6).	1 - As provided in the responses regarding TEMP V8 (19124290-490-TM-TEMP V8 Comment_Response_AEM_Rev1 submitted on July 13, 2020), Agnico's response is below: The GN refers to GN Commitment No.20, on a program to report and monitor helicopter traffic, as not being included. Helicopter traffic was discussed at the 15-16 January 2019 TAG meeting (noted in the meeting minutes). Agnico Eagle commented on the infrequent and sporadic use of helicopters related to the Meadowbank Complex, and that they are used on an as-needed basis only. It was also noted at the meeting that measures are included in the TEMP regarding helicopters, and these were updated in TEMP V7 per GN Commitment No.18-20 in terms of distance buffers to avoid disturbance to wildlife (refer to TEMP V8 Table 9) and helicopter communications through the helicopter dispatch (refer to TEMP V8 Appendix C). As such, the commitment is addressed, and a standalone helicopter traffic monitoring program is not required. 2- Agnico Eagle will evaluate the possibility to provide data in the 2020 Annual Report.	Appendix 47 of the 2020 Annual Report, Section 3.5.7
GN	MBK/WT	2019 Annual Report - NIRB - No 28 and 31 (Project Certificate 008) Agnico Eagle Mines (AEM) Ltd. (2019). Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7; Agnico Eagle Mines (AEM) Ltd. (2020). Meadowbank Mine 2019 Wildlife Monitoring Summary Report. Final. Appendix 52 of the Meadowbank Mine Annual Report.	In accordance with term and conditions 28 and 31, the 2019 Wildlife Monitoring Summary Report (AEM 2020) provides a summary of traffic data for the Project's roads that can be compared to traffic predictions made in the Project's Final Environmental Impact Statement (FEIS) and FEIS Addendum. There is some uncertainty about the traffic parameters reported. Clarification is sought on this matter in-order to determine whether traffic levels in 2019 were above or below predicted level of Project roads. Importance to review and supporting rationale: The traffic data reported in Table 3.7 and Figure 3.6 of Appendix 52 are expressed as "monthly traffic data" and "number of vehicle trips", respectively. It may be assumed, by the reviewer, that each of these metrics represents the number of one-way transits made by vehicles along roads rather than round trips. However, this assumption should be verified since it affects whether traffic levels are above or below FEIS predictions which in turn determines whether the adaptive management provisions of term and condition 31 are applicable.	The GN offers the following recommendations to the Board with respect to this issue: 1. That AEM provide an explanation of the reported traffic metrics clarifying whether they represent one-way transits or round trips.	Data reported represents the number of one-way transits to or from one location to another location. Agnico Eagle acknowledges the recommendation and will add clarification in the next annual report.	Appendix 47 of the 2020 Annual Report, Section 2.6.3
GN	MBK/WT	2019 Annual Report - NIRB - No 28 (Project Certificate 008) Agnico Eagle Mines (AEM) Ltd. (2019a). Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7; Agnico Eagle Mines (AEM) Ltd. (2019b). Commitment list from NIRB technical meetings on the Whale Tail Expansion proposal, Baker Lake, June 11-13, 2019; Agnico Eagle Mines (AEM) Ltd. (2020). Meadowbank Mine 2019 Wildlife Monitoring Summary Report. Final. Appendix 52 of the Meadowbank Mine Annual Report; Government of Nunavut (GN). (2019). Comments on Agnico Eagle Mines Ltd.'s Meadowbank Gold Mine Project 2018 Annual Monitoring Report.	The 2019 Wildlife Monitoring Summary Report concludes that Project effects on the movements of caribou were successfully mitigated because the caribou protection decision trees within the TEMP were applied when caribou were seen near Project facilities (AEM 2020, Section 17, Table 17.1). These decision trees specify changes in monitoring or mitigation activities, designed to manage disturbance of caribou, that are automatically triggered when caribou in numbers above Group Size Thresholds (GST) and within specified distances of the Project are observed (AEM 2019a, Figures 6 to 9). The format of the report makes it hard determine whether the decision trees were properly implemented in 2019. A previous commitment by the Proponent to revise the format for reporting caribou observations and the mitigation/adaptive management actions taken in response to those observations has not been fulfilled. Based on the content of the 2019 Wildlife Monitoring Summary Report, the GN cannot ascertain whether the Proponent's conclusion, that the caribou decision trees were properly implemented, is accurate. Importance to review and supporting rationale: Observations of caribou, some of which should have triggered monitoring and mitigation actions, in accordance with decision trees, are provided in large appendices in the form of handwritten field data sheets (AEM 2020, Appendices A and B) or tables (AEM 2020, Appendix E). Monitoring and mitigation actions taken in response to caribou near the Project, such as road closures are summarized in separate tables within the main body of the report (e.g. AEM 2020, Tables 3.9 to 3.11). There is no direct linkage between these two data sets (observations and actions). This prevents the reviewer from linking observations of caribou to subsequent actions. Therefore, the Proponent's claim that the Project's Caribou Protection Measures (CPM), as specified in the decision trees, were implemented in 2019 cannot be assessed without conducting a detailed audit of these two datasets. This requires considerable resources that some reviewing parties may lack. The GN has previously raised concerns about the Proponent's reporting on the implementation of caribou decisions trees (GN 2019, GN-10). During the NIRB's review of the Whale Tail Project expansion proposal, the Proponent committed to the following: "All observations of caribou will be reported in future Meadowbank and Whale Tail Wildlife Monitoring Summary Reports using the format presented in Table GN-TRC- #4-1 of AEM's response to technical comments on the Expansion Project." (AEM 2019b, Commitment 11) This commitment was intended to satisfy the GN's on-going concern about the inability to verify the Proponent's compliance with the CPMs in the TEMP. This table has not been provided in the 2019 Wildlife Monitoring Summary Report.	The GN offers the following recommendations to the Board with respect to this issue: 1. That the Proponent provide all 2019 observational data for caribou, alongside the corresponding monitoring and mitigation responses that were implemented, in the table format previously committed to by the Proponent during the NIRBs review of the Whale Tail Project expansion proposal, and that this table be provided to parties for review.	1- Agnico Eagle had already provided to the TAG, via email on July 30th, 2020, the 2019 observational data for caribou in the table format committed during the NIRB's review of the Whale Tail Project.	Appendix 47 of the 2020 Annual Report, Section 2.6.4

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
GN	MBK/WT	2019 Annual Report - NIRB - No 28 (Project Certificate 008) Agnico Eagle Mines (AEM) Ltd. (2019a). Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7. Agnico Eagle Mines (AEM) Ltd. (2019b). Commitment list from NIRB technical meetings on the Whale Tail Expansion proposal, Baker Lake, June 11-13, 2019; Agnico Eagle Mines (AEM) Ltd. (2020). Meadowbank Mine 2019 Wildlife Monitoring Summary Report. Final. Appendix 52 of the Meadowbank Mine Annual Report; Government of Nunavut (GN). (2019). Comments on Agnico Eagle Mines Ltd.'s Meadowbank Gold Mine Project 2018 Annual Monitoring Report.	The 2019 Wildlife Monitoring Summary Report concludes that Project effects on the movements of caribou were successfully mitigated because the caribou protection decision trees within the TEMP were applied when caribou were seen near Project facilities (AEM 2020, Section 17, Table 17.1). These decision trees specify changes in monitoring or mitigation activities, designed to manage disturbance of caribou, that are automatically triggered when numbers of caribou above Group Size Thresholds (GST) and within specified distances of the Project are observed (AEM 2019a, Figure 6 to 9). The format of the report makes it hard to determine whether the decision trees were properly implemented in 2019. However, a detailed review of the report's appendices, conducted by the GN, indicates there were numerous occasions in 2019 when caribou groups, above the Group Size Thresholds (GST) and within the Distance Thresholds (DT) specified in the TEMP, were observed near Project roads but automatic mitigation actions (such as road closures) were not implemented, as required by the decision trees. Contrary to the Proponent's conclusion, these findings suggest that the decision trees were not fully implemented in 2019, in accordance with the TEMP. It appears that what are supposed to be automatic actions in response to observed caribou are instead being implemented as discretionary measures. This is the second year since the initiation of the Whale Tail Project that implementation of the CPMs specified in the Project's TEMP has been incomplete (GN 2019 – GN comment #10). During the NIRB's review of the Whale Tail Project and Whale Tail Expansion Project, the assumption that these CPMs would be fully implemented by the Proponent was viewed by the GN as one of the key factors reducing the substantial uncertainty and risks associated with the Project. The GN remains concerned that these CPMs are not effective when they are being applied incompletely. The GN maintains that the Proponent has not fulfilled the requirements of term and condition 28. Importance to review and supporting rationale: Road Closures in Response to Caribou The Project's TEMP contains a series of caribou protection decision trees that are intended to reduce effects of the Project on the movements and distribution of caribou (AEM 2019a, Figures 6 to 9). In particular, during defined caribou migration seasons in the spring and fall, these decision trees specify changes in monitoring or mitigation activities, including road closures, that are supposed to be automatically triggered when caribou in numbers above Group Size Thresholds (GST) and within specified distances of the Project are observed. Section 3.6.6 of the 2019 Wildlife Summary Monitoring Report (AEM 2020) discusses road-related mitigation that occurred in 2019 in response to caribou near the Project. Tables 3.9 and 3.11 present data showing the dates when the Meadowbank AWAR and the Whale Tail Haul Road were closed to traffic in response to caribou. From these tables it is not possible to determine which caribou observations triggered these road closures and subsequently triggered reopening to traffic. Observations of caribou during road surveys and incidental observations by Project personnel, some of which should have triggered automatic monitoring and mitigation actions in accordance with the decision trees, are provided within the report as large appendices (AEM 2020, Appendices A, B, E). The report does not directly link these two data sets (observations and actions). This prevents the reviewer from understanding whether the caribou decisions trees are being properly implemented. Therefore, the Proponent's claim that the Project's CPMs, as specified in the decision trees, were implemented in 2019 cannot be assessed without conducting a detailed audit of these two datasets. A detailed review and comparison of Appendices A, B, and E with the road closures listed in Tables 3.9 and 3.11 shows that there were numerous days in 2019 when caribou groups, above the GST and within the Distance Thresholds (DT) specified in the TEMP, were observed near Project roads, but the automatic road closure specified in the decision trees was not implemented (See Table 1 below). These observations were made incidentally and during official road surveys along both the AWAR and Whale Tail Haul Road. On most days, multiple observations above road closure trigger thresholds were made. The report does not explain why Project roads were not closed in response to these observations. These findings suggest the link between caribou monitoring and mitigation actions is weak or ineffective, and that mitigation actions, specifically identified in the TEMP as automatic responses to caribou observations, are not being applied or are being applied in a discretionary rather than automatic manner. This raises concerns about the efficacy of the Project's CPMs and indicates non-compliance with the TEMP and therefore with term and condition 28 of the Project certificate. This is the second year since the Whale Tail Project began that the GN has voiced the opinion that the implementation of the CPMs has been incomplete (GN 2019 – GN Comment #10). Table 1. Observations of caribou above GSTs and within Distance Thresholds, that should have triggered road closures in 2019, for which no mitigation or adaptive management response is recorded. 1- Source: Meadowbank Goldmine Project 2019 Wildlife Monitoring Summary Report, Appendix A 2019 Road Survey Forms – Meadowbank AWAR and Vault Haul Road; and Appendix B 2019 Road Survey Forms – Whale Tail Haul Road 2 - Source: Meadowbank Goldmine Project 2019 Wildlife Monitoring Summary Report, Appendix E 2019 Wildlife Observation Records Essential Vehicles The Project's TEMP specifies, during periods when the roads are closed due to the presence of caribou that only essential vehicles will be allowed on the closed roads. Roads will be closed to all non-essential vehicles. The TEMP defines essential and non-essential vehicles as: "Essential vehicles include vehicles operated for the purpose of maintaining the safety of personnel, Emergency Response Team (ERT), security and wildlife monitoring."; and "Non-essential vehicles and heavy equipment - all vehicles or heavy equipment except those operated for the purpose of maintaining the safety of personnel. For clarity, nonessential vehicles shall include vehicles and equipment used to continue mining operations or hauling of ore." (AEM 2019a, Figures 7 and 8) In 2019, during periods when Project roads were closed due to the presence of caribou (AEM 2020, Tables 3.9 to 3.11), some traffic was still permitted to use the closed roads. The comments column of Tables 3.9 to 3.11 notes that convoys for "daily ride" and other traffic used the closed roads. However, the amount of traffic and whether this traffic was consistent with the definition of "essential vehicles" is unclear based on the information provided in the report.	The GN offers the following recommendations with respect to this issue: 1. That the Proponent explain why Project roads were not closed in response to caribou observations made on the days listed in Table 1 of this comment. 2. That the Board direct the Proponent to implement the CPMs fully and consistently in the TEMP in accordance with the Group Size and Distance Thresholds specified in the decision trees (AEM 2019 a, Figures 6 to 9). 3. That the Board direct the Proponent to report all observational data for caribou, alongside the corresponding monitoring and mitigation responses that were implemented, in the table format previously committed to by the Proponent during the NIRBs review of the Whale Tail Project expansion proposal. That this table be provided to parties for review in each Annual Report. 4. That for each of the road closures listed in Tables 3.9 and 3.11 of the 2019 Wildlife Summary Monitoring Report, the Proponent explain what criteria and monitoring data were used to make the decision to reopen the road. That the Proponent also provide, summarized in table format, the monitoring data used to support each reopening, for review by the GN and other parties. 5. That for the road closures listed in Tables 3.9 and 3.11 of the 2019 Wildlife Summary Monitoring Report, the Proponent provide information on the number of convoys that occurred on each day and how many vehicles were in each convoy. That the Proponent also explain how the different types of vehicles in these convoys fit the definition of "essential vehicles" as specified in the TEMP.	1- Agnico Eagle is continuously looking for improvements or optimization in monitoring and management approaches, and will consider the GN's recommendation for the presentation of data in subsequent annual reports. As stipulated in the TEMP's decision trees (Figures 6 to 9; TEMP Version 7), satellite collar information, as received from the GN, is reviewed regularly and with increasing frequency closer to sensitive seasons, in tandem with increasing level of ground surveys as caribou come closer to the Meadowbank Complex footprint. Per discussions through the Meadowbank Complex Terrestrial Advisory Group (TAG) in January 2019, Agnico Eagle increases ground monitoring frequency as collar data shows animals within 50 km of the roads, to detect caribou groups in relation to the seasonal GSTs for implementation of appropriate mitigation measures. Caribou can reach the Mine site or roads from the 50 km buffer within 1 to 3 days, per previous collar data analyses and information from literature (see response to Recommendation 1.2). Caribou can be observed from ground surveys to a distance of approximately 4 km (refer to TEMP Section 3.4.2), and is variable due to site topography and elevation. As noted in Section 3.6 of the 2019 Wildlife Monitoring Summary Report (Appendix 52 of Agnico Eagle 2020), data and information on surveys conducted, numbers of caribou observed, traffic data and road restrictions and closures are presented for the Meadowbank Complex. The AWAR (including the Vault Haul Road) was closed for partial to full days (with select convoys on an as required basis for essential vehicles and services), as presented in Table 3.9 and 3.10, for 28.5 days in spring and 17.5 during fall, for a total of 46 days of closures in 2019. The Whale Tail Haul Road was similarly closed for partial to full days (with select convoys) as presented in Table 3.11, for 32.5 days in spring, 9.5 days in summer and 14.5 during fall, for a total of 56.5 days of closures in 2019. The closure dates for all roads coincide with caribou road crossing observations and in consideration of collared caribou information from the GN (i.e., mitigations were in place prior to caribou crossing the road) – for example, caribou groups in line with the spring GST were first observed crossing the Whale Tail Haul Road on April 12 (see Table 3.12), and the Haul Road had been closed approximately 1.5 days prior, as of 14:30 on April 10 (see Table 3.11); the last large caribou group (much greater than the spring GST) was observed crossing the Haul Road on May 3, and the Haul Road was reopened later. Upon further analysis, some mitigation measures such as speed reductions and restricted access were implemented on the project roads but did not show within the road closures table. Some closure dates were also inadvertently not included into the final road closure table. Thus, measures were triggered upon monitoring data but were not logged. Agnico will ensure, as per comments in Recommendation 6, to improve overall links between actions. Also, caribou mitigation measures in the TEMP, as stipulated under Level 3 (refer to TEMP Figures 6 to 9), note that mining activities may resume and roads reopened during sensitive seasons if project-tolerant caribou are observed grazing next to the road/not migrating, with a 30 km/h speed limit imposed. 'Project-tolerant' is defined in the TEMP (Section 3.4.2) as, "an animal or group of animals (i) observed within a mitigation distance buffer for greater than 72 hours during the winter or 48 hours during other seasons, and (ii) not visibly disturbed by the Project [activities]." Time periods of collared caribou within the 50 km and 25 km buffer and behaviour responses during ground surveys (at least once per day) are noted to determine if animal(s) encountered are project-tolerant, and in such cases, road restrictions or closures may not be required (refer to Section 9.5 of the Appendix 52; Agnico Eagle 2020), as a precaution while the animals are being observed. Many caribou groups of different sizes are continuously present in proximity to the Meadowbank Complex year round, including during the sensitive seasons, and are not disturbed by traffic, blasting or other mining activities. Analyses of collared Lorillard caribou completed in Golder (2019) on interactions with the Haul Road and AWAR, which the GN reviewed, also showed that there are collared caribou that do not migrate between general calving areas or winter ranges. This pattern of non-migratory caribou was present during baseline and is unrelated to the AWAR or the Haul Road. The existence of a non-migratory ecotype of barren-ground caribou and/or plastic migratory behaviour (Mallory et al. 2020) may further support the concept of 'project-tolerant' animals observed. References Golder (Golder Associates Ltd.). 2019. Lorillard collared caribou movements: Implications from interacting with the Whale Tail Haul Road and All-weather Access Road. Prepared for Agnico Eagle Mines Limited by Golder Associates Ltd. DRAFT Revision 1, November 2019. Victoria, BC. Golder (Golder Associates Ltd.). 2020. Lorillard collared caribou movements: Implications from interacting with the Whale Tail Haul Road and All-weather Access Road. Prepared for Agnico Eagle Mines Limited by Golder Associates Ltd. DRAFT Revision 2, May 2020. Victoria, BC. Mallory CD, Williamson SN, Campbell MW, Boyce MS. 2020. Response of barren-ground caribou to advancing spring phenology. Oecologia 192:837-852. 2 - See response to 1.4, Recommendation 7-1 above. Agnico Eagle followed the decision trees per TEMP Version 7 (Figure 6 to 9) in 2019, and continues to implement these measures. The TEMP is under revision (TEMP Version 8, Agnico Eagle 2020), including the GSTs per recent analyses and ongoing discussions with the TAG, as Agnico Eagle seeks to improve and optimize mitigation measures in consideration of achieving environmental protection goals and commitments, while allowing for efficiencies for operations where feasible. Reference Agnico Eagle (Agnico Eagle Mines Limited). 2020. Meadowbank Division: Terrestrial Ecosystem Management Plan. Version 8, April 2020. 3- Agnico Eagle is continuously looking for improvements or optimization in monitoring and management approaches, and will consider the GN's recommendation for the presentation of data in subsequent annual reports. 4- Actions in relation to road reopening are field and observation based, in collaboration with the local BLHTO monitor and Environmental staff. Those actions are not systematically recorded and logged into summary tables. Although initial monitoring would show groups greater then GST on project roads, for example in morning monitoring; further monitoring during the day would show that groups has kept moving further infield and thus would not be observed any longer upstream. Agnico Eagle is committed to improved in more efficiently tracking those elements moving ahead, as discussed within the TAG and specified in Recommendation 6. 5- Daytime convoys for essential vehicles and services are used on site during the sensitive season for caribou, per Level 3 mitigation measures (refer to TEMP Table 7 and Figures 6 to 9). Per the information provided in Tables 3.9 to 3.11, convoys were conducted daily when required (i.e., once per day). Agnico Eagle consults with the KivIA and HTO, as well as the GN as appropriate, when Level 3 mitigations are triggered, and this includes discussion on the use of convoys accompanied by a pilot vehicle to ensure speed limits and caribou right-of-way measures are adhered to. Convoys also included road maintenance as the project roads represent an essential lifeline to mine workers and also enables the roads to be safely accessible for wildlife monitoring.	Appendix 47 of the 2020 Annual Report, Section 2.6.4

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
GN	MBK/WT	2019 Annual Report - NIRB - No 28 (Project Certificate 008) Agnico Eagle Mines (AEM) Ltd. (2019a). Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7; Agnico Eagle Mines (AEM) Ltd. (2019b). Commitment list from NIRB technical meetings on the Whale Tail Expansion proposal, Baker Lake, June 11-13, 2019; Agnico Eagle Mines (AEM) Ltd. (2020). Meadowbank Mine 2019 Wildlife Monitoring Summary Report. Final. Appendix 52 of the Meadowbank Mine Annual Report; Government of Nunavut (GN). (2019). Comments on Agnico Eagle Mines Ltd.'s Meadowbank Gold Mine Project 2018 Annual Monitoring Report; Nunavut Impact Review Board (NIRB). (2017) Final hearing report, Agnico Eagle Mines Ltd. Whale Tail project. NIRB File No. 16MN056.t.	The 2019 Wildlife Monitoring Summary Report concludes that Project effects on the movements of caribou were successfully mitigated because the caribou protection decision trees within the TEMP were applied when caribou were seen near Project facilities (AEM 2020, Section 17, Table 17.1). These decision trees specify changes in monitoring or mitigation activities, designed to manage disturbance of caribou, that are automatically triggered when caribou numbers above Group Size Thresholds (GST) and within specified distances of the Project are observed (AEM 2019a, Figures 6 to 9). In reaching this conclusion, the report assumes that these decision trees are being fully implement and that they are effective in reducing disturbance. However, neither the extent to which they were implemented, nor their effectiveness, is evaluated in the report. Consequently, the GN considers the report's conclusion to be tenuous and of low confidence. During the NIRB's review of the Whale Tail Project, the Proponent committed to conduct a statistically robust evaluation of the Project's CPMs (NIRB 2017, Appendix B, Commitment 1). Despite the availability of data in 2019 to perform some of parts of this evaluation, the Proponent has not attempted to critically evaluate the CPMs. For example, road surveys to detect groups of caribou near the Project are a key monitoring tool for triggering adaptive management/mitigation measures such as road closures in-order to facilitate the migration of caribou without sensory disturbance by Project activities such as road traffic (AEM 2020, Section 3.2). The GN has identified several concerns with the road survey data within the 2019 Wildlife Monitoring Summary Report (AEM 2020, Appendices A and B), they are as follows: • The range over which these surveys are capable of detecting caribou is very limited and well below the distance thresholds that are employed within the TEMP's CPMs for triggering enhanced monitoring and mitigation actions, including road closures. These findings suggest that the Proponent currently lacks the capacity to detect caribou approaching the Project in time to enact mitigation measures designed to reduce disturbance of migratory movements. The inadequacy of this survey method indicates that the CPMs lack an effective/sensitive monitoring trigger and are thus unlikely to be effective unless road closures are maintained for prolonged periods during migration seasons. • Road survey results show that the vast majority of caribou observations are concentrated near Project roads on the road-side facing the on-coming migration. This finding is consistent with the hypothesis that caribou are being significantly obstructed by Project roads; a finding that is consistent with analyses of caribou collar being conducted by the GN and soon to be published. Importance to review and supporting rationale: Road surveys to detect caribou and other wildlife are a main feature of the Project's TEMP for monitoring Project effects and triggering adaptive management measures such as road closures in-order to reduce disturbance of migrating caribou. The methodology for these surveys is described in the 2019 Wildlife Monitoring Summary Report as follows: "The terrain on both sides of the road (to a maximum horizontal distance of approximately 1 km perpendicular from the road edge) is surveyed as the vehicle progresses at a maximum speed of 30 km per hour." (AEM 2020, Section 3.4) Given the importance of these surveys for triggering mitigation and adaptive management, careful scrutiny of the data produced by these surveys is warranted. Section 3.4.2.3 of the TEMP states that: "It is recognized that this type of survey data is limited to the sightability and detection of caribou from the survey locations. Consequently, the determination of sightability and detection functions will be attempted for the various monitoring methods (AWAR/Haul Road scan surveys, Roadside surveys and HOL surveys)." (AEM 2019a) Despite the availability of a sizeable data set derived from 2019 and other observations, these detection functions for road surveys have not been presented in the 2019 Wildlife Monitoring Summary report. The effectiveness of road surveys in detecting caribou approaching the project could be evaluated using the available data and should be evaluated as per the TEMP. This is a critical step in evaluating the Project's CPMs as committed to by the Proponent during review of the Whale Tail Project (NIRB 2017, Appendix B, Commitment 1). As an initial step in this evaluation, the GN has compiled and reviewed the 2019 road survey data. Based on this review the GN has identified the following areas of interest: • If caribou were unobstructed by Project roads, the distribution of observations should be approximately equal on either side of the road. However, despite observers surveying both sides of Project roads, during both the spring and fall migration, the vast majority (91%) of caribou observations along the All-Weather-Access-Road (AWAR) and the Whale Tail Haul Road in 2019 were concentrated on the road-side facing the on-coming migration (figures 1 a to d). This finding is consistent with the hypothesis that caribou are being obstructed by Project roads and are aggregating into high densities as they approach the road and attempt to cross; a finding that is also consistent with analyses of caribou collar being conducted by the GN and soon to be published. • As illustrated in Figures 1 a to d, most of the observations of caribou made by road survey observers were within 500m of the roads. For example, during the two periods when caribou observations were highest, spring time along the Whale Tail Haul Road (n = 615) and fall time along the AWAR (n = 183), 77% and 92% of the caribou groups observed were within 500m of the roads, respectively. These statistics demonstrate that road surveys have a range of detection considerably less than the 4 km and 1.5 km distance thresholds that are specified in the TEMP for triggering increased monitoring and road closures, respectively (AEM 2019a, Figures 6 to 9). This finding suggests that road surveys are not an effective trigger for CPMs that are designed to reduce disturbance of migrating caribou. These surveys cannot detect caribou before they are subject to disturbance by Project activities such as ore hauling traffic. • Looking at the road survey data for the Whale Tail Haul Road during the spring-time migration, when most caribou observations were made in 2019 (n = 615 groups), group sizes of caribou observed within 250 metres of the road were significantly larger than groups observed within 251-500m of the road (Mann Whitney U-Test, p = 0.03). This suggests that caribou may be coalescing into larger groups as they approach the Project's roads, in response to disturbance. The GN notes that these are exploratory analyses, only, and do not provide definitive results. Nevertheless, they highlight the need to conduct more detail analyses of the road survey data using multiple covariates, such as distance from road and road status (i.e. open vs closed). Such analyses are particularly important when considering revision of caribou GSTs in the TEMP that are used for triggering road closures, for developing new strategies for road management in response to caribou movements and for developing new methods of detecting caribou approaching the Project. Figure 1. Frequency of caribou observations, made during road surveys, on the east and west sides of the Whale Tail haul road (1a) and All-Weather-Access-Road (1b) during the spring migration. Similar data presented for the Whale Tail haul road (1c) and AWAR (1d) for the fall migration. (Data derived from AEM 2020, Appendices A and B)	The GN offers the following recommendations with respect to this issue: 1. That, the Board direct the Proponent to conduct a comprehensive analysis of the available caribou observation data (for 2019 and earlier years) including road surveys and incidental observations; the GN believes that completion of this analysis within 6 months of receipt of this recommendation is reasonable. These analyses should be based on guidance provided by the TAG (as per its terms of reference). The results of these analyses should be used to assess the effectiveness of caribou detection methods and to make appropriate revisions to GSTs used in the TEMP to trigger automatic road closures. A report on the findings and recommendations from these analyses should be provided to the Board, GN and other parties for review. 2. Noting that road surveys alone are inadequate for detecting and responding to the presence of caribou near the Project, that Board direct the Proponent to invest in the long-range detection of migrating caribou.	1- It is not surprising that the distribution caribou groups observed may be skewed toward the direction of caribou migrating toward roads since the monitoring is designed to help migrating caribou move successfully across roads by triggering mitigation. Adding monitoring effort on the downstream side of roads would inhibit this process and represent a risk to caribou. At the November 2019 TAG meeting the GN acknowledged that the GST should be focussed on caribou group observations that are approaching the roads (EDI 2020, shared with TAG members), which is consistent with the above concept. The Final Environmental Impact Statement (FEIS) for both the Meadowbank and Whale Tail Projects (collectively referred to as the Meadowbank Complex) assumed that the Mine roads would act as a partial barrier. The GN's conclusion of their exploratory analysis appears to confirm this assumption. However, data from Lorillard collared caribou indicate that such a pattern has not influenced the duration of caribou cow migratory movements to reach calving areas or calving events or calf mortality (Golder 2020), so any apparent coalescence the GN believes is present does not appear to have a measurable demographic consequence. Golder (2020) also demonstrated that the amount of time collared caribou are within 4 km of the road during spring migration is unrelated to how long roads are closed (Golder 2020). Thus, closing the road does not influence caribou movements through the local road area and within the spatial extent of sensory disturbance from Haul Road traffic predicted for the Whale Tail Project. The GN has provided graphs of the number of caribou observations as a function of distance but has not provided evidence that caribou group sizes are also increasing. However, it would not be surprising that group sizes may be larger near observers as caribou are more easily seen and accurately counted. Other factors such as topography and weather may influence how well observers can detect caribou. Caribou groups could also aggregate as they move between large lakes that are adjacent to Mine roads. The Height of Land (HOL) surveys referenced by the GN are no longer used (TEMP Version 8; Agnico Eagle 2020), which was a decision supported by the TAG during meetings in January and November 2019. New roadside surveys were implemented in 2020 following a viewshed analysis that identified monitoring locations that achieved an approximate 4 km line-of-sight distance, which may improve distances at which caribou groups can be observed. References Agnico Eagle (Agnico Eagle Mines Limited). 2020. Meadowbank Division: Terrestrial Ecosystem Management Plan. Version 8, April 2020. EDI (Environmental Dynamics Inc.). 2020. Caribou Road Crossing Mitigation – Technical Memorandum. Prepared for Agnico Eagle Mines Limited. February 2020. Golder (Golder Associates Ltd.). 2020. Lorillard collared caribou movements: Implications from interacting with the Whale Tail Haul Road and All-weather Access Road. Prepared for Agnico Eagle Mines Limited by Golder Associates Ltd. DRAFT Revision 2, May 2020. Victoria, BC. 2- According to the TEMP, the hierarchical mitigations used are based on monitoring results that are within the referenced distances and not explicitly at those distances. Agnico Eagle is already investigating (i.e., investing) other monitoring approaches, such as drones to supplement monitoring results (TEMP Version 8; Agnico Eagle 2020). A pilot program with drones was scheduled for 2020 but was canceled due to the COVID pandemic. It will be resumed when safe to do so. References Agnico Eagle (Agnico Eagle Mines Limited). 2020. Meadowbank Division: Terrestrial Ecosystem Management Plan. Version 8, April 2020.	Appendix 47 of the 2020 Annual Report
CIRNAC	MBK	CIRNAC Comments on Agnico Eagle Mines' (AEM's) 2018 Annual Report for Meadowbank Gold Mine and Whale Tail Pit Projects; Appendix 1, AEM's 2019 Annual Report for Meadowbank Gold Mine and Whale Tail Pit Projects	1.1 In its comments for the 2017 Annual Report Review, CIRNAC recommended that AEM include a meaningful discussion of the results from the permafrost monitoring in the Annual Report. Specifically, FEIS predictions should be compared with monitoring results and be clearly presented. AEM should present the updated modeling supporting their conclusions that the conceptual plans for thermal encapsulation of the Tailing Storage Facility and the Waste Rock Storage Facility remain effective to prevent and control deleterious seepage over long term. If results show discrepancies from the predicted values, AEM should discuss the management actions that should be implemented to address the risk. CIRNAC notes that AEM continues to assess the existing and predicted long-term thermal performance of mine wastes and cover systems at the Meadowbank and Whale Tail sites. Multiple assessments are ongoing and have been integrated into the closure planning process. AEM also notes that while progressive reclamation of some mine wastes has begun, designs have not been finalized. As such, progressively reclaimed areas may need to be upgraded as additional information on freezeback becomes available in the future. Such information will be provided in future annual reports, specific research studies and/or closure and reclamation plans. 1.2 CIRNAC recommended that AEM continue to provide information on the nature and extent of research efforts, results of the research and a discussion of how the proposed cover design has been influenced by these results. AEM continues to assess the existing and predicted long-term thermal performance of mine wastes and cover systems at the Meadowbank and Whale Tail sites. Multiple assessments are ongoing and have been integrated into the closure planning process. Such information will be provided in future annual reports, specific research studies and/or closure and reclamation plans. 1.3CIRNAC recommended that future updates to Interim Closure and Reclamation Plans (ICRP) include more details on progressive reclamation such as: areas of Tailings Storage Facility (TSF) and Waste Rock Storage Facility (WRSF) facilities covered in the prior year, total areas covered to date, along with the volumes associate with these areas, amongst others. 1.4 CIRNAC recommended that AEM continue analyzing the thermistor monitoring results against early thermal modelling predictions and update its Waste Rock and Tailings Management Plans if large discrepancies are observed between the monitoring results and model predictions. AEM continues to assess the existing and predicted long-term thermal performance of mine wastes and cover systems at the Meadowbank and Whale Tail sites. Multiple assessments are ongoing and have been integrated into the closure planning process. Additional information will be provided in future annual reports, specific research studies and/or closure and reclamation plans.	1.1: This is an on-going topic that will be a focus of future planning for the operational and closure phases of the project. As such, the prior recommendation has yet to be fully addressed and continues to apply. 1.2: This is an on-going topic that will be a focus of future planning for the operational and closure phases of the project. As such, the prior recommendation has yet to be fully addressed and continues to apply. 1.3The Meadowbank ICRP and 2019 Annual Report both include high level summaries of progressive reclamation completed during the reporting period. However, there is insufficient detail to develop a full understanding of the completed work. As a result, the prior recommendation continues to apply. 1.4 This is an on-going topic that will be a focus of future planning for the operational and closure phases of the project. The prior recommendations have yet to be fully addressed and continue to apply.	1.1 Agnico Eagle is monitoring freeze back in tailings and the waste rock and will continue to do so and expand the monitoring program as required. The data gathered will continue to be analysed and compared to the FEIS prediction to ensure that the closure strategy and concept still met the closure prediction. The closure strategy for the WRSF and TSF are documented in the interim closure plan. Detailed Engineering closure design will be updated to reflect the current condition of the TSF and WRSF but no significant change to the closure concept are planned based on the available information. As such progressively reclaimed area should be considered reclaimed and will only be modified if data show that the previously accepted closure criteria would not be met. 1.2 Agnico Eagle is monitoring freeze back in tailings and the waste rock and will continue to do so and expand the monitoring program as required. The data gathered will continue to be analysed and compared to the FEIS prediction to ensure that the closure strategy and concept still met the closure prediction. Results will be provided annually. Detailed Engineering closure design will be updated and reflect the current condition of the TSF and WRSF. This update will integrate information regarding the completed research studies and their results along with a discussion on how these results could be used to optimise the cover design to adequate performance. 1.3 Agnico Eagle acknowledges the recommendation and will continue to provide more details on progressive reclamation in future update of the ICRP. Details related to work completed and scheduled of progressive reclamation is included in the closure schedule presented in Appendix P of the ICRP (found in Appendix 55 of the 2019 Annual Report). 1.4 Agnico Eagle is monitoring freeze back in tailings and the waste rock and will continue to do so and expand the monitoring program as required. The data gathered will continue to be analysed and compared to the FEIS prediction as more data become available to ensure that the closure strategy and concept still met the closure prediction.	2020 Annual Report, Section 12.4.5 and Section 9

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
CIRNAC	MBK	AEM's 2019 Annual Report for Meadowbank Gold Mine and Whale Tail Pit Projects; Meadowbank ICRP, Appendix 55 of AEM's 2019 Annual Report for Meadowbank Gold Mine and Whale Tail Pit Projects	AEM's revised water quality monitoring and forecasting indicates that aluminum, arsenic, cadmium, chromium, copper, iron, nickel, selenium, fluoride, TSS and ammonia in pits may exceed the Canadian Council of Ministers of the Environment (CCME) guidelines or other site-specific criteria during the closure phase. Lead, sulfate, chloride, cyanide and nitrate may also represent a potential long-term contamination risk. CIRNAC notes that the number of parameters requiring treatment has progressively increased over the years. AEM indicates that the increase in forecasted concentration for certain parameters is mainly due the milling and deposition of tailings from ore body extracted from Whale Tail pit. The ore body at Whale Tail pit has a different geochemical behavior when compared to the ore body from Portage/Goose/Vault pits. The revised forecasting results indicate that water treatment will likely be required during the closure phase. This has significant implications to the long-term care and maintenance of the Meadowbank site, as well as financial securities. Despite these implications, CIRNAC notes that the Interim Closure and Reclamation Plan (ICRP) for the Meadowbank site (Appendix 55) presents no information regarding long-term water treatment requirements and options. Instead, the ICRP states: "Treatment options will be examined and will be assessed in greater detail if required during the preparation of the Final Closure and Reclamation Plan." While CIRNAC agrees that final decisions regarding long-term water treatment are not required at this stage, the Department is of the view that the process of defining potential requirements and options should be initiated as soon as possible. Based on our experience working on a wide range of projects, multiple years are required to develop and refine closure strategies. In addition, it is critical that CIRNAC ensure that sufficient financial security is available for all long-term closure requirements.	CIRNAC recommends that the next iteration of the Meadowbank ICRP identify and examine potential water treatment scenarios based on current and future water quality projections during the closure phase. Although final decisions are not required at this time, costs associated with implementing the most likely water treatment scenario should also be incorporated into security estimates.	It is Agnico Eagle's intent to start water treatment bench scale testing using the reclaim water stored in the pits. The objective of these bench scale testing shall be to assess the most suitable water treatment processes that can be used at closure to treat the reclaim water prior to pit flooding. In next year's report, a plan will be provided describing the general timeline to perform bench scale laboratory testing, on-site testing (if required) and development of design of the water treatment process for closure. In the ICRP, there is currently provision for the water treatment. Following the results of the bench scale testing, the costs associated with the water treatment scenario could be adjusted.	2020 Annual Report, Appendix 50
CIRNAC	MBK/WT	Term and Condition (T&C) #59, Whale Tail Project Certificate • S. 11.10.3, AEM's 2019 Annual Report for Meadowbank Gold Mine and Whale Tail Pit Projects • 2019 Socio-economic Monitoring Report, Appendix 69 of AEM's 2019 Annual Report for Meadowbank Gold Mine and Whale Tail Pit Projects	Pursuant to T&C #59 of the Whale Tail Project Certificate, AEM are encouraged to make cross-cultural training initiatives available to employees and on-site subcontractors. The 2019 Socio-economic Monitoring Report provides the uptake and completion rates for employees only.	CIRNAC recommends that AEM include the uptake and completion rates of cross-cultural training initiatives for on-site sub-contractors as well as employees in future annual report submissions. As specified in T&C #59, such initiatives are a means of promoting respect and consideration for the importance of Inuit Qaujimajatuqangit.	Agnico Eagle's' cross-cultural training program, developed with the assistance of the Nunavut Literacy Council, is mandatory for all Agnico Eagle employees and contractors who will be on site for six months or more. Agnico Eagle agrees with this recommendation and will report on the number of employees and contractors who complete the program beginning in the 2020 reporting year.	2020 Annual Report, Section 11.10.3.2.3.2
KIA	MBK	2019 Annual Report; 4.4.2 Water Balance Water Quality Model Reporting Summary; 4.4.2.1 Meadowbank Site; 4.4.3 Predicted Vs Measured Water Quality 4.4.3.1 Meadowbank Site Meadowbank ICRP Update 2019; 5.2.4.2 Closure Objectives and Criteria	"The Water Quality Forecast 2019 (SNC, 2020) provides water quality modelling with updated parameters (including dissolved) to determine the need for potential treatment at closure. The updated water quality forecast model applies to the North and South Cell TSF Reclaim Ponds, and the Portage, Goose, Vault and Phaser Pits. A review of the available water quality data measured in 2019 was undertaken. Treatment may be required for aluminium, arsenic, cadmium, chromium, copper, iron, lead, nickel, selenium, thallium, chloride, fluoride, sulphate, and total ammonia/total nitrogen equivalent, as the pit water quality may exceed CCME limits if the water is not treated, based on the completely mixed assumption." We are concerned that treatment may be required in perpetuity to ensure water overlying tailings disposed of in mined out pits will be suitable for aquatic habitat as indicated through current closure planning. This concern is exacerbated by the apparent divergences between predicted water quality and the majority of measured water quality parameters currently measured in all pits at the Meadowbank site.	Agnico Eagle should include explicit descriptions and planning for treatment of water in the flooded pits sufficient to meet CCME water quality guidelines and establish aquatic habitat in the 2020 annual report should monitoring and updates to the water quality forecast required for that report continue to indicate treatment may be required for water in the flooded pits. We further recommend Agnico Eagle explore additional habitat offsetting opportunities should water quality modelling and measurements continue to indicate that the end pit lakes may not be viable habitat in the post closure environment without treatment.	In-pit deposition of tailings has started as of July 2019 at Meadowbank. The reclaim water stored in Goose Pit and also in Portage Pit are sampled on a regular basis to assess the changes in water quality parameters over time. The data collected are compared against the forecasted values and the water quality forecasting model shall be adjusted accordingly. It is also Agnico Eagle's intent to start water treatment bench scale testing using the reclaim water stored in the pits. The objective of these bench scale testing shall be to assess the most suitable water treatment processes that can be used at closure to treat the reclaim water prior to pit flooding. In next year's report, a plan will be provided describing the general timeline to perform bench scale laboratory testing, on-site testing (if required) and development of design of the water treatment process for closure. Agnico Eagle does not intend at this moment to explore additional habitat offsetting opportunities. Agnico Eagle's intent is to meet the end pit lake water quality as per our Water License criteria and current ICRP.	2020 Annual Report, Appendix 50

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
KIA	MBK	2019 Annual Report; 8.5.3.1.7 Portage Rock Storage Facility (ST-16)	"The KIA requested that Agnico continue monitoring until there is a 5 year period of non-detect cyanide results. In 2018 (5 previous year), the monitoring indicated that yearly average for CN levels does not exceed the CCME guideline, the MDMER or Water License limit for effluent discharge into the environment for NP2, NP1 and downstream lakes, Dogleg and Second Portage. Thus, based on the analysis of the previous results, Agnico Eagle has suspended the current program in 2019. However, ECCC's comment regarding the 2018 Annual Report recommended that Agnico continue to monitor Lake NP-2 on a yearly basis for the same suite of parameters as have been measured since 2014. Water quality results for 2019 ST-16 and NP-2 South can be found in Table 8-19 and 8-20, respectively. Monitoring stations are illustrated on Figure 1." Table 8-19 indicates that WAD cyanide decreased between 2014 and 2016, but increased again in 2017. WAD cyanide was again below detection in 2018 and 2019. The intent of the initial request for cyanide monitoring was to demonstrate that the source had been mitigated and cut off. We remain concerned with potential seepage from the tailings facility given that cyanide concentrations as measured at ST-16 are inconsistently low. We therefore concur with ECCC's recommendation to continue monitoring the full suite of parameters as outlined in Table 8-19 until WAD cyanide measured at ST-16 is below the detection limit for 5 consecutive years.	Agnico Eagle should continue monitoring water quality at ST-16 and in NP-2 for the full suite of parameters as outlined in Table 8-19 and Table 8-20 until WAD cyanide is measured below the detection limit for 5 consecutive years.	As per Agnico Eagle's responses to ECCC recommendation provided to NWB regarding the 2018 Annual Report on November 1st, 2019, Agnico will continue to monitor water quality in NP2-South on a yearly basis for the same suite of parameters measured since 2014. Water quality monitoring at ST-16 will also continue to be sampled as per the Water License 2AM-MEA1530 Schedule 1 Table II Group 1 and will also included the supplemental parameters presented in Table 8-19 of the 2019 Annual Report. Agnico will not commit at this moment on a definitive timeline or threshold (WAD cyanide is measured below the detection limit for 5 consecutive years) for ending the monitoring.	2020 Annual Report, Section 8.5.3.1.7
KIA	WT	2020 Annual Report; 8.5.3.2 Whale Tail Site	Agnico Notes that "there are no applicable license limits" for several lakes in the receiving environment, including Lake A47 (ST-WT-6), Lake A45 (ST-WT-13), Lake A16 outlet (ST-WT-14), Lake A15 (ST-WT-15). These lakes are in the receiving environment and are potentially or may be in the future, impacted by mine activities. Lakes A45, A16 and A15 in particular are part of the Whale Tail Lake and Mammoth Lake flow paths respectively, and will be impacted by both the impoundment of the Whale Tail south basin, and discharge activities into both Whale Tail South and Mammoth Lake. While licence discharge limits are not applied to these lakes, comparisons should still be made to CCME water quality guidelines and baseline conditions to understand whether the downstream environment is impacted by mine activities and implement mitigations if they are. Recommendation 5: Agnico Eagle should compare results from these sites to a) historical monitoring data to identify if water quality is changing relative to the normal range, and b) CCME WQGs for PAL.	Agnico Eagle should compare results from these sites to a) historical monitoring data to identify if water quality is changing relative to the normal range, and b) CCME WQGs for PAL.	Agnico Eagle acknowledges KIA's recommendation and will evaluate the possibility to provide requested comparison and analysis in the 2020 Annual Report.	2020 Annual report, Section 8.5 and Appendix 33
KIA	WT	2019 Annual Report; 8.5.8.2.4 Subsurface seepage and surface runoff from waste rock piles Appendix 12 Whale Tail Water Management Plan Version 4; APPENDIX C 2019 Water Balance Report	Agnico Eagle notes "In July 2019, seepage stream were observed on the downstream toe of Whale Tail Dike. The flow was measured using v-notch weirs at approximately 300 m3/h which is higher than what was anticipated in the water balance. A detailed investigation including additional instrumentation and geophysics was conducted for a better understanding of the seepage phenomenon at the Whale Tail Dike." We are concerned that water balance modelling prepared for the approved project and updated for the 2019 Annual Report (Appendix 12C 2019 Water Balance Report) did not appear to include a sensitivity analysis beyond use of 2019 precipitation data which can be considered a "wet year" scenario. Increased seepage volumes beyond the base case as an increased source of contact water was not considered. Concerns regarding the lack of sensitivity analysis and corresponding management options were expressed by KIA during the EA and water licence reviews for the expansion project. While we note that the base case was well modelled, we remain concerned that Agnico Eagle may have difficulties managing water should continued divergences from base case modelling persist. We also note that "FEIS predictions for MAM were exceeded for TDS, lithium, and the ionic compounds calcium and magnesium. Despite early warning triggers and FEIS predictions being exceeded in 2019, the absolute concentrations of these parameters remain low and far lower than concentrations associated with adverse to aquatic life." We are concerned that water quality parameters in the receiving environment have also already exceeded FEIS predictions in the first full year of operation.	We recommend future iterations of the water quality and load balance models, intended for submission as part of the 2020 Annual Report, include additional sensitivity analysis scenarios focused on the potential for additional contact water. The Water Management Plan should also be updated for the Whale Tail site as part of the 2020 Annual Report to include mitigation options to provide confidence Agnico Eagle can manage contact water volumes in excess of the base case scenario presented in the EA and Water Licence.	Agnico Eagle acknowledges KivIA' comment and will update the water quality forecast as per the recommendation in the 2020 Annual Report. Mitigation options were presented in the Adaptive Management Plan. This plan is still undergoing the NWB approval process.	2020 Annual Report, Appendix 12
KIA	MBK/WT	Appendix 1 – Meadowbank and Whale Tail Commitments	The formatting in the table makes it difficult to read some of the text. For example, the text in column 3 (Regulator's comment) often runs into column 4, overlapping with that column's text. Likewise, text in column 4 (Regulator's recommendation) is sometimes cut off. It would also be helpful to number the comments for easy reference	Please re-format the table to ensure that all text can be read and comments can be easily referenced.	Agnico Eagle acknowledges KIA's comments and has provided an update Appendix A - Meadowbank and Whale Tail Commitments in Appendix 1 of this responses document.	2020 Annual Report, Appendix 1
KIA	WT	Appendix 1 – Meadowbank and Whale Tail Commitments, Appendix 19 – Whale Tail 2019 Dike Construction and Dewatering Monitoring Report	We commented in the review of the 2018 Annual Report that 50% is not a standard value for RPD analysis and we recommended that a standard value (such as 20% recommended by the USEPA) be used for QA/QC purposes, or that Agnico Eagle provide a reference to support use of a 50% RPD for comparison . At that time, Agnico Eagle responded that CCME state that a RPD of 40% for surface water field duplicate samples is acceptable. Thus, the CCME guidance does not appear to support using a 50% RPD comparison. The 50% standard is again being used in the 2019 Report (Appendix 19), but no reference is provided.	Please clarify why 50% is an appropriate standard for RPD analysis of surface water samples, given that both USEPA and CCME recommend lower values.	Agnico recognizes this error in internal communication and will use an RPD value of 40% for future surface water quality analyses, according to CCME guidelines.	2020 Annual report, Appendix 39
KIA	MBK	Appendix 11 – Meadowbank 2019 Water Management Report and Plan Version 8, Appendix C – 2019 Meadowbank Water Quality Forecasting Update, 2.3.1 Measured vs. Forecasted Concentrations	The forecasting model does not incorporate possible geochemical reactions that could promote metal precipitation of the water column for the North and South Cell TSF Reclaim Ponds. As a result, some forecasted values may be higher than measured values for some parameters (such as total iron and total nickel). Including metal precipitation in the model would strengthen forecasting calculations.	Agnico Eagle should incorporate metal precipitation into the forecasting model for the TSF Reclaim Ponds	In the Meadowbank Water Quality Forecasting Update for the 2019 Water Management Plan report, section 4.2.4, the water quality in the pits are forecasted assuming a conservative water/mass balance approach. SNC also performed geochemical equilibrium simulation using the software PHREEQC to assess which parameters could precipitate out of solution and which parameters could remain in solution. The equilibrated solution is then compared against CCME guideline. In the 2020 annual water quality forecast report, Agnico will continue to use a conservative water/mass balance approach to assess the water quality parameters in the pits and then perform a geochemical equilibrium simulation to evaluate the best case scenario if some of the parameters were to precipitate out of solution.	2020 Annual Report Appendix 11, Appendix C, Table 4-1
KIA	MBK	Appendix 11 – Meadowbank 2019 Water Management Report and Plan Version 8, Appendix C – 2019 Meadowbank Water Quality Forecasting Update, 2.4.1 Additional Mill Effluent Water Quality Results	Agnico Eagle states that mill effluent concentrations (not including the Whale Tail contribution) are similar in 2019 to 2015-2018 levels for all parameters except nickel and selenium. In 2019, average nickel concentrations were two orders of magnitude greater than in 2018 (2.661 vs. 0.026 mg/L), while selenium average concentrations were two orders of magnitude smaller than in 2018 (0.007 vs. 0.131 mg/L). What were the possible reasons for these deviations in mill effluent concentrations for nickel and selenium in 2019?	Please discuss possible reasons for the deviations from previous year average concentrations measured in mill effluent for nickel and selenium in 2019	With regard to Total Nickel concentration in the mill effluent measured in 2019, one sample showed a high concentration of total and dissolved nickel concentration. The higher concentration of nickel present in the mill effluent could be the result of a change in the operating parameters in the mill process plant which created a condition that did not favour the precipitation of nickel. As for selenium, it is possible that the nature of the ore being processed leached a lower concentration of selenium in the process water.	2020 Annual Report Appendix 11, Appendix C, Table 2-4
KIA	MBK	Appendix 11 – Meadowbank 2019 Water Management Report and Plan Version 8, Appendix C – 2019 Meadowbank Water Quality Forecasting Update, 6.2 Results Summary and Treatment	The SNC-Lavalin Water Quality Forecasting Update makes several recommendations, to improve the predictive ability of the model for the Reclaim Pond and Portage and Goose Pits, all of which Agnico Eagle commits to implementing. One of the recommendations is to "Perform a bench scale water treatment test to evaluate containment removal efficiency using treatment approaches such as lime neutralization, coagulation/flocculation with aluminum sulphate or ferric sulphate, and coagulation/flocculation with proprietary coagulants designed for metal removal as well as alternate treatment options." Agnico Eagle should discuss when it plans to test different treatment options, as the preferred approach should be well established prior to closure.	Please discuss when different treatment options will be tested for the Reclaim Pond and Portage and Goose Pits.	Please refer to response provide in Section 3.1.3 above.	2020 Annual report, Appendix 50
KIA	MBK/WT	Appendix 52: Meadowbank Mine 2019 Wildlife Monitoring Summary report. Purpose of Summary Report S 2 Overview	The report's purpose includes describing the "natural variation and potential mine-related changes in wildlife populations" (S 2.1, pg 2). However, the report relies on observed numbers or averages without descriptive statistics or fitting trends. The lack of even basic statistical analysis hinders comparing the 2019 data with the previous years and the extent to which, if any, it lies outside the range of natural variation and is more likely to be an effect of the mine.	Agnico Eagles should use descriptive statistics and trend analyses to report on natural variation and potential mine-related changes in wildlife.	Due to the large degree of natural variation inherent in ecosystems, it is often difficult to detect indirect effects with only one or two years of data. Therefore, a more comprehensive analysis and discussion of all data monitoring will be completed every three years.	2020 Annual Report, Appendix 47, Appendix D
KIA	MBK/WT	S 3.6.4 Road Surveys; Traffic Data and Caribou Movements	Agnico Eagle has presented traffic frequency data for 2019 showing monthly totals for haul trucks, medium and light equipment in table (Tables 3.7) and graphic (Fig. 3.6) format. These data are a useful addition as traffic data are essential to evaluating the effectiveness of caribou (and muskox) mitigation. Further benefits would be gained by clarifying whether the number of vehicle trips are vehicle passages (one passing of a location road regardless of direction) or round trips (two passages of a location). November 2019 had the highest annual number of vehicle trips (Table 3.7) which at one trip/10 minutes is less than the predicted rate from the expansion review (a vehicle/6.4-7.6 minutes). This a concern as traffic levels will increase further with full capacity hauling, and even at these 2019 levels Appendix J (Whale Tail Haul Road - Remote Camera 2018/2019 Summary; S 3.3, pg 6) indicates caribou delayed crossing the haul road in fall 2018 by 1–90 minutes after a convoy vehicle.	Agnico Eagle should clarify whether traffic data presented (number of vehicle trips) are vehicle passages (one passing of a location road regardless of direction) or round trips (two passages of a location).	Please refer to Agnico Eagle's response on Section 1.3 above	2020 Annual report, Appendix 47, Section 2.6.3

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
KIA	MBK/WT	S 3.6.7 Road Surveys; Caribou Responses to Mitigation	While Table 3.12 (pgs 34-35) is useful to see annual patterns of crossing, these data are not an evaluation of caribou responses to mitigation. For example, it is unclear what mitigation was in place when these crossing events occurred. Also, it is unclear whether caribou movements across the road were delayed or deflected in any way prior to crossing (Appendix J suggests delays occur). Did a shift in range patterns cause the increase in caribou sightings in 2019, and what were the implications for mitigation?	Agnico Eagle should clarify what mitigation was in place to facilitate caribou road crossings, and the behaviour of caribou groups prior to crossing. This should include details of convoys relative to road closures.	Please refer to response 1.4, Recommendation 7-1 to 7.5. A remote camera study is underway along the Whale Tail Haul Road to support understanding of possible deflections that may occur for caribou prior to crossing roads in consideration of the physical parameters of the road and traffic, and a summary of preliminary photographs obtained from the pilot study in late 2018 are presented in Appendix J of the 2019 Wildlife Monitoring Report (Appendix 52, AEM 2020). The objective of the pilot study was to determine the usefulness of a remote camera program and to refine the setup to collect the best data possible. It is too early to assume that the photos presented in Appendix J suggest delays occurred for caribou crossings in relation to the Haul Road. Results (refer to Section 3.3. of Appendix J) indicate time differences of five minutes or less to over an hour for caribou crossings after vehicle passage, though it is unknown if these time differences are due to vehicle passage or proximity of caribou to the Haul Road prior to crossing. Deflection is best understood through the collection of caribou behaviour monitoring data, in tandem with analysis of remote camera data, and more robust analyses will be undertaken as more data is collected.	2020 Annual Report, Appendix 47, Section 17.2 and Appendix G
KIA	MBK/WT	Annual Report; 2019 Activities; Section 2.1; page 30	The full year payable gold production for 2019 is noted as 1,782,147 ounces. In addition, the Barnet gold deposit, which is located in Quebec, is mentioned.	The KIA would appreciate a better explanation of what portion of the 1,782,147 ounces is related to the Nunavut operations of Agnico Eagle. In addition, an explanation of why the Barnet gold deposit, which is based in Quebec, is included in this Annual report.	In the 2019 Annual Report, Agnico provided a general update of the productivity of the Company of all his Divisions, which include gold deposit in Quebec. Agnico Eagle will add more detail regarding number reported in the upcoming 2020 Annual Report. Of the 1,782,147 ounces reported, 193,489 ounces were from the Meadowbank/Whale Tail mines.	2020 Annual Report, Section 2.1
ECCC	MBK/WT	Meadowbank and Whale Tail 2019 Wildlife Monitoring Summary Report	As indicated in section 15.4, ECCC confirms that we had discussions with the proponent regarding the project's migratory bird monitoring program and possible plans moving forward. ECCC did advise the proponent that a more comprehensive analysis of the existing data is necessary to inform the discussion and for ECCC to support a change of the monitoring objectives as was being proposed. ECCC looks forward to reviewing the comprehensive analysis and continue discussions with the proponent and other interested parties.	No recommendation for the NIRB's information only	Agnico Eagle acknowledges ECCC'S comment and will provided the comprehensive analysis as per previous discussion.	2020 Annual report, Appendix 47
ECCC	MBK	2019 Water Management Report and Plan V. 8 Appendix C. Meadowbank Water Quality Forecasting Update for the 2019 Water Management Plan, SNC Lavalin, Apr. 2020	Section 3.2 of the Forecasting Update notes that "The main source of cyanide, copper, iron, selenium, other metals, ammonia (i.e. via the hydrolysis of cyanate), nitrate, chloride, sulfates and total dissolved solids in the TSF Reclaim Pond is the Mill Effluent." Many of the parameters were observed to be substantially higher than originally predicted due to the geochemistry of the Amaruq ore, and the mill effluent concentrations have been adjusted to account for this. The modeled predictions presented in Section 4.3 indicate that treatment may be required for heavy metals, fluoride, arsenic, selenium and total nitrogen, as well as for suspended solids. The report states that treatment could be done of water in the pit at the end of tailings deposition, or in the TSF South Cell Reclaim Pond. Treatment processes may involve the use of reagents (e.g. aluminum sulphate, ferric sulphate) which can increase sulphate, which is already predicted to exceed objectives at closure. If the full volume of reclaim water is to be treated at closure, then treatment residuals should be factored into the predicted pit water quality to be managed. The proposed use of ion exchange treatment to remove TDS (chloride, sulphate) is suggested in the report as an option at closure. However, this technology is costly and has volume limitations. Planning for treatment at closure may have obstacles that could be reduced with earlier treatment implementation. Figure 4.21 outlines the Water Treatment Decision Flow Process for implementing treatment, and includes the option of treating reclaimed water during operations. This has not been presented in the 2019 Annual Report as an option being actively considered. However, it would make sense in respect of reducing contaminants at source rather than treating much larger water volumes later at closure. In addition, given that the Amaruq expansion will be proceeding there may be higher loadings of the contaminants of concern over the remaining life of mine, and earlier treatment reductions would reduce that environmental liability.	ECCC requests that the proponent provide a discussion of the feasibility of treating reclaimed water earlier in the mine operations, e.g. segregating high-concentration water and treating to remove contaminants.	The main contaminants that reports to the reclaim water comes from the processing of the ore in the mill. Thus, the focus of treatment should be on the mill effluent discharged with the tailings to the pit. As part of the development of the treatment strategy for closure, one avenue that could be explored is to evaluate the feasibility of performing treatment during operation. Treatment of the mill effluent could be considered using existing equipment in the mill. Treatment of the reclaim water stored in the pit could also be considered. However, before moving forward with such an approach, bench scale testing should be planned and undertaken at site to evaluate suitable water treatment approach that could be implemented during operation and/or at closure. A more detailed discussion on water treatment of the mill effluent, and any other individual streams, during operation shall be provided in the 2020 Annual Forecast Report.	2020 Annual report, Appendix 50
ECCC	MBK/WT	2019 Water Management Report and Plan, Section; 2.3 North and South Cell TSF Reclaim Ponds (ST-21); 2.3.1 Measured vs Forecasted Concentrations	The proponent has provided predictions for the dissolved form of metals for comparison to measured dissolved metals, with reference to the CCME guidelines (for total fractions) for comparison. Dissolved zinc (http://ceqg-rcqe.ccme.ca/download/en/360) and manganese (http://ceqg-rcqe.ccme.ca/download/en/361) guidelines are now available and would be relevant to include in the tables.	ECCC recommends including the dissolved guidelines for zinc and manganese in the tables in Appendix 22.	Agnico Eagle acknowledges ECCC's comment and will included CCME guidelines for dissolved zinc and manganese in the comparison table in next year's report.	2020 Annual Report Appendix 11, Appendix C, Table 2-2
ECCC	MBK/WT	Whale Tail Marine Mammal and Seabird Observer Report – 2019 Shipping Season • Gjerdrum, C., D.A. Fifield, and S.I. Wilhelm. 2012. Eastern Canada Seabirds at Sea (ECSAS) standardized protocol for pelagic seabird surveys from moving and stationary platforms. Canadian Wildlife Service Technical Report Series No. 515. Atlantic Region. vi + 37 pp.	Section 2.3 of the Whale Tail Marine Mammal and Seabird Observer Report (2019 Shipping Season) indicates that "surveys from moving and stationary platforms are completed in 5-minute intervals". However, section 3.3.2.1 states that "…stationary platform survey datasheets lacked survey end times". It is unclear if the stationary seabird surveys conducted in 2019, as part of the Marine Mammal and Seabird Observer (MMSO) program, followed established ECCC seabird survey protocols (Gjerdrum et al. 2012). The instantaneous stationary surveys should usually only last a few seconds (i.e. using instantaneous counts or snapshots of birds within the area), or else you cannot obtain accurate abundance estimates. ECCC has noted unusual observations of species outside their range (e.g. Manx shearwater and Wilson's storm petrel). Wherever possible, photographs should accompany these types of observations. ECCC noted observer-training records in the 2019 report, and encourages the proponent to continue these efforts to improve the quality of information collected. Section 4.0 states that a 2020 action plan was created to improve the effectiveness of the MMSO Program. ECCC welcomes any discussions with the proponent related to the seabird-monitoring program. ECCC requests an opportunity to review and discuss any proposed changes to the seabird monitoring components prior to implementation. Similar to previous years, ECCC would like to request a copy of the seabird data recorded during the MMSO surveys conducted in 2019. If the seabird data has not been entered into a database already, then an existing ECCC seabird database is available to assist the proponent with data entry and facilitate data sharing. The proponent should contact ECCC at ec.eenordrpnnu-eanorthpnrnu.ec@canada.ca to request a copy of the database and share the seabird data from the MMSO surveys.	ECCC recommends that the proponent confirm that the MMSO program followed established ECCC seabird survey protocols (Gjerdrum et al. 2012), and include a reference to the protocols in future annual monitoring reports. ECCC recommends that the proponent contact ECCC to review and discuss any proposed changes to the seabird monitoring components prior to implementation. Additionally, ECCC requests a copy of the seabird data recorded during the MMSO surveys conducted in 2019.	Agnico Eagle currently follow the approved MMSO found in Appendix B of the Shipping Management Plan (Version 3, Dec 2018). If any modifications are to be done in regard to the seabird monitoring, Agnico Eagle will ensure to contact ECCC prior any changes being implemented. In 2020, Agnico Eagle also hired a consultant to provide training material to vessels and thus enhance data collection. As detailed in Section 2.1.4 Seabird Survey Protocol of the management plan, the protocols laid out were extracted and adapted from CWS standardized protocol for pelagic surveys from moving and stationary platforms (Gjerdrum et al. 20112). Agnico Eagle already provided the seabird data recorded during the MMSO surveys conducted in 2019. The table are provided in Appendix A of the MMSO 2019 Shipping Report found in appendix 71 of the 2019 Annual Report. Agnico Eagle will appreciate if ECCC can confirm that it fulfills their expectations.	2020 Annual report, Appendix 57
ECCC	WT	Whale Tail Pit Water Management Plan 1.1.1 Saline Water Management Reference: Section 3.1.4.16; Appendix B – Water Management Schematic Flowsheets	**Comment 1:** The overall site management describes the storage of high salinity groundwater in GSP1 and low salinity groundwater in GSP2. If treatment of low salinity groundwater is required, the brine produced from treating GSP2 saline water would be directed to GSP1, along with the high salinity water from the operations. As per the flowsheets provided in Appendix B, the high salinity water from GSP1 will also be treated and discharged to Whale Tail Lake. However, with the addition of the brine to GSP1, it would be expected that the salinity of GSP1 would increase substantially over time, becoming more concentrated as additional brine from GSP2 treatment is added to the pond. Given that the water in GSP1 is indicated to be discharged to Whale Tail Lake, a discussion on treatment efficiency and discharge quality should be provided.	**Recommendation 1**: ECCC recommends that the Proponent provide additional clarity and discussion on management and treatment of saline groundwater, including expected treatment efficiencies.	The water management strategy for saline water is currently under revision by Agnico. Agnico is looking at an Underground Project limited into the permafrost only. This change results in no more treatment and discharge of saline water to Whale Tail Lake. The water management strategy for underground water would only be based on storing water in GSP-1 and GSP-2. High and low salinity water would not be segregated anymore. At closure, the water from GSP1 and GSP2 will be sent underground. The water management strategy for saline water will be updated in the next version of the Whale Tail Pit Water Management Plan. If the underground project change and revert to the scope of the FEIS application additional details on management and treatment of saline groundwater will be provided in the water management plan.	2020 Annual Report, Appendix 12, Section 3.1.4.16
ECCC	WT	Whale Tail Pit Water Management Plan 1.1.2 Discharge Locations Reference: Section 3.1.4.4	**Comment 2:** The Water Management Plan states that, "any water requiring treatment will be pumped to the water treatment plant(s) prior to discharge through the diffuser in Mammoth Lake or through a diffuser in Whale Tail Lake (South Basin) or other alternatives." The Proponent does not provide an additional description of what "other alternatives" for discharge are being considered.	**Recommendation 2:** ECCC recommends that the Proponent identify what is meant by "other alternatives" and indicate whether any other locations are being considered for discharge.	In the Whale Tail Pit Water Management Plan the "other alternatives" mentioned for discharge are outlined in the Whale Tail Pit Expansion Project Adaptive Management Plan (Table 3: Receiver Water Quality Adaptive Management Strategy). The plan is currently under the NWB approval process. The other alternatives for discharge are Lakes D1 and D5 in the case that Level 3 is reached (high risk situation in the receiver water quality). Discharging in Lakes D1 or D5 would require a complete assessment of potential discharge, with approval from the NWB as per NIRB Project Certificate Conditions.	2020 Annual Report Appendix 12, Section 3.1.4.4

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
KIA	WT	Whale Tail Pit Water Management Plan 1.2.1 Update Frequency Reference: Executive Summary, page ii	**Comment 1**: In the summary it documents that 'the conservative predictions of future water quality indicate that most parameter concentrations in the downstream environment are below CEQG-AL except for arsenic.'	**Recommendation 1:** The KivIA would like to know how often the water balance and water quality modeling will be updated, in particular, as it relates to the arsenic concentration.	The water balance and water quality modeling will be updated once per year for the annual reporting exercise.	2020 Annual Report Appendix 12, Executive summary
CIRNAC	WT	Whale Tail Pit Water Management Plan 1.3.1 Treated Effluent Discharge Period for Lake A16	**Comment 1**: In the Whale Tail Pit Water Management Plan, Section3.1.3: Waterbody Inventory - Watershed A - Various water management activities, Table 3.1, the treated effluent discharge period is not indicated for Lake A16.	**Recommendation 1:** CIRNAC recommends that AEM clarify the treated effluent discharge period for Lake A16, and include this information in any future updates of the Whale Tail Pit Water Management Plan.	The treated effluent discharge period for Lake A16 (Mammoth Lake) began in the second dewatering phase of the project in June 2019 and will continue throughout mine operations and into closure. This information will be included in future updates of the Whale Tail Pit Water Management Plan.	2020 Annual Report Appendix 12, Section 3.1.3
CIRNAC	WT	Whale Tail Pit Water Management Plan 1.3.2 Water Infrastructure Performance Issues	**Comment 2:** In the Water Management Plan, Section 3.1.4.2: Dike Construction - Northeast Dike, AEM states that during summer 2019, the water natural flow was impeded by the natural topography. This resulted in issues with the planned overflow conveyance system which needed to be changed with the addition of a pumping system. In Section 3.1.4.18: Non-Contact Water Management, AEM states that in order to adequately manage non-contact water, some passive flows have been substituted with a pumping alternative that complies with the original intent of the approved water balance and Water Licence 2AM-WTP1830 (same origin and same destination). AEM adds that those systems were proposed as adaptive management methods in response to the encountered site conditions during open water season and the high volume of precipitation received, resulting in additional volume of water to manage. Although AEM states that "the water quality is not considered at risk as this is non-contact water from the NE Pond" there are impacts on water management structures as described above, and there may be subsequent potential for transformation of non-contact water (Lake A49 overflow) into contact water (pit water), and problems with Total Suspended Solids (TSS) related requirements under Water Licence 2AM-WTP1830, Part F (Item 7).	**Recommendation 2:** CIRNAC recommends that AEM continue to identify and assess the water infrastructure performance issues and monitor the adequacy of the conveyance system put in place to allow for a more efficient water management, and subsequently avoid emergency situations. In addition, AEM would benefit from capturing the lessons learned related to the design, construction and operation issues and include them in the Water Adaptive Management Plan and other related management plans.	Agnico will continue to identify and assess the water infrastructure performance issues to ensure efficient water management. A lesson learned exercise on the 2019 freshet was performed in 2020 and was used to improve water management practices and plans for 2020 and beyond. Agnico is pleased to report the 2020 open water season went much smoother than 2019.	2020 Annual Report Appendix 12, Section 3.1.4.2

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
CIRNAC	WT	Whale Tail Pit Water Management Plan 1.3.3 Dike Construction - IVR Dikes	**Comment 3:** A short description of the IVR Dikes, including details regarding their design, typical section and role, is presented in the 2019 Water Management Plan, Section 3.1.4.2: 2 Dike Construction - IVR Dikes. This section has been removed from the 2020 version (Version 5) of the Water Management Plan. It is not clear why these details have been removed.	**Recommendation 3:** CIRNAC recommends that AEM clarify why the description of IVR Dikes has been removed, or where this information is now located	The details on IVR Dike have been removed from the water management plan as this infrastructure is currently under detailed engineering design and the information presented was outdated. Information will be added in the plan once the structure is commissioned.	2020 Annual Report Appendix 12 Section 3.1.4.2
CIRNAC	WT	Whale Tail Pit Water Management Plan 1.3.4 Dike Construction - IVR Dikes	**Comment 4:** Section 3.1.4.5 of the 2019 Water Management Plan states: O'Kane Consultants developed a landform water balance model in April 2019. The objective of the landform water balance was to estimate the runoff, interflow, and basal seepage rates for different slopes and aspects of the Whale Tail and IVR WRSFs (OKC, 2019). A summary and a discussion of results were included under this section in the 2019 version of Water Management Plan. It is not clear why the results have been removed from the 2020 version (Version 5) of the Water Management Plan, as this section pertains to estimated landforms runoff inflows into various attenuation ponds and potential basal seepage from landforms, and the reference to the O'Kane Consultants document is given under Section 3.1.4.7 – Water Management in Whale Tail Waste Rock Storage Facility.	**Recommendation 4**: CIRNAC recommends that AEM clarify why the results of the landform water balance model, developed by O'Kane Consultants, have been removed, or where this information is now located.	Information on the landform water balance model can be found in the report referenced in the management plan (OKC, 2019). The results of the model are integrated in the water balance presented in the report.	2020 Annual Report Appendix 12, Section 3.1.4.5
CIRNAC	WT	Whale Tail Pit Water Management Plan 1.3.5 Whale Tail Dike Seepage	**Comment 5:** In the Whale Tail Water Management Plan, Section 3.1.4.2: Dike Construction, Whale Tail Dike Seepage, AEM states that in July 2019 a seepage flow was identified and reported, and the seepage flow rate was higher than the rate anticipated. AEM reports that a detailed investigation took place to better understand the situation and "A pumping system was installed to manage the seepage water, as presented in Section 3.1.4.15 of this report" referring to the same plan. Section 3.1.4.15: Water Management for Landfill does not present details of the pumping system for managing seepage water. It is not clear where these details are provided.	**Recommendation 5:** CIRNAC recommends that AEM provide the details pertaining to the pumping system that was installed to manage the seepage water referenced in Section 3.1.4.2, or clarify where these details are now located.	The reference in the water management plan to the seepage pumping system should have read Section 3.1.4.18; this will be corrected in the next version. The as-built report of this system is under redaction. Reference to the report and a summary description of the system will be added to Section 3.1.4.18 in the next revision of the management plan.	2020 Annual Report Appendix 12, Section 3.1.4.2
ECCC	WT	Whale Tail Pit Waste Rock Management Plan 3.1.1 Waste Rock Properties Reference: Section 5.1 – Waste Rock Properties	**Comment 1:** The Proponent states that "All open pits waste material will be sampled and tested during operations to confirm their ARD and ML potential in support of waste segregation. Based on results to date, a sulphur content of 0.1 wt. % appears to be a suitable threshold to identify PAG material". ECCC notes that even at 0.1 wt. % total sulphur, with no neutralization material, the waste may still have the potential to generate acid.	**Recommendation 1**: ECCC recommends that the Proponent ensure that there is sufficient neutralization material is available and that segregation does not solely rely on the percentage of sulphur content.	As detailed in the Operational ARD-ML Sampling and Testing Plan (Version 5, April 2019), the ARD and ML potential of each waste rock lithology was evaluated through a static and kinetic testing program (Golder 2016). Details on the test methods used and results obtained are provided in Golder (2016; summarized in Appendix A). The Whale Tail Pit geochemical characterization study (Golder 2016) examined the use of carbonate neutralization potential (NP) as a surrogate for bulk NP using data obtained from exploration drilling (Golder 2016). The carbonate NP and bulk NP correlate well (R2= 0.97), implying that net potential ratio (NPR) calculated using carbonate NP is a safe assessment of available buffering capacity. Further, the maximum potential acidity (MPA) is calculated based on the total sulphur content of the samples (rather than sulphide content), which is conservative. This approach to ARD classification is based on observed trends in rock chemistry, mineralogy, and reactivity of neutralizing minerals (Golder 2016). The ARD potential of waste materials from Whale Tail Pit are classified first based on total sulphur content and then using the NPR-based guidelines published by MEND (2009). Total sulphur will be used as an initial screening criteria to identify NPAG material, whereby a sample will be considered NPAG when it contains less than 0.1 wt% sulphur, regardless of the NP (Golder 2016). Where total sulphur is above 0.1%, the calculated carbonate NPR value will be used for sample classification and summarized in Table 3.2 of the ARD-ML Management Plan. The cut-off content to determine PAG and NAG material has been selected to ensure sufficient neutralization potential and thus, it is Agnico Eagle's intent to continue to operate in compliance with the approved Operational ARD-ML sampling and Testing Plan (Version 5, April 2019). Reference: Golder (Golder Associates Ltd.). 2016. Evaluation of the Geochemical Properties of Waste Rock, Ore, Tailing, Overburden and Sediment from the Whale Tail Pit and Road Aggregate Materials, Agnico Eagle Mines, Meadowbank Division. Document No. 042. June 2016.	2020 Annual Report Appendix 23, Section 5.1
ECCC	WT	Whale Tail Pit Waste Rock Management Plan 3.1.2 Ore Properties Reference: Section 6.1 – Ore Properties	**Comment 2:** The Proponent states "The delay to onset of ARD from ore is expected to be substantially longer than the seven years LOM." ECCC notes that the statement above does not provide sufficient detail on what will cause the delay of the onset of ARD. The Proponent does not clarify whether this delay is caused by presence of neutralization potential, or that there will be no reaction until the stated delayed onset.	**Recommendation 2:** ECCC requests that the Proponent provide additional detail on the anticipated delay to the onset of ARD, including a description of the mechanisms that are likely to lead to this delay.	Kinetic leaching tests, mineral depletion calculations and consideration of the scale and site differences between laboratory tests and field conditions suggest a time lag to possible ARD development in the ore (and waste rock) at the site of more than a decade (Section 4.7.5, FEIS Amendment Volume 5, Appendix 5-E). Mineral depletion calculations provide an estimate of time to depletion of acid generating (sulphide) minerals and acid-consuming minerals (carbonates), and thus can be used to evaluate the likelihood of the generation of ARD and approximate time to onset of ARD. Theoretical mineral depletion calculations for pyrite and buffering capacity were completed based on the MEND (2009) guidance using ABA data, the measured kinetic test sulphate and alkalinity release rates, and the leachate volumes, which assumes that the depletion of the neutralization potential occurs theoretically at the same rate as the experimentally determined sulphate production rate. The rate of dissolution of buffering minerals depends on the rate of sulphide mineral oxidation and effectiveness of the available buffering minerals. The rate of sulphide mineral oxidation and neutralization potential NP dissolution under laboratory conditions is accelerated compared to site conditions due to several factors; including slower sulphide mineral oxidation kinetics at lower site temperatures; winter freezing conditions at site; and the lower rock to liquid ratio in the field that slows the rate of buffering mineral dissolution	2020 Annual Report Appendix 23, Section 6.1
ECCC	WT	3.1.3 Waste Rock Storage Facilities Design Reference: Section 5.3 – Project Waste Rock Storage Facilities Dimensions; Section 6.3.2 – Underground Operations	**Comment 3:** The Proponent states that "the current design and overall sideslope angle of the Project WRSFs is 2.5V:1V, an angle generally considered stable for such a facility (see Figure 5.1 for a typical cross section)". The Proponent also states in section 6.3.2 (Underground Operations) that "The sideslope angle of these ore stockpiles will be 3V:1V, an angle generally considered stable for such facility" It is not clear to ECCC whether this is a typographical error, and that 2.5H:1V & 3H:1V was intended instead of 2.5V:1V & 3V:1V.	**Recommendation 3:** ECCC requests that the Proponent clarify the sideslope angle dimensions for the WRSF and ore stockpiles.	The sideslope angle dimensions for the WRSF are 2.5H:1V and the sideslope angle dimensions for the ore stockpiles are 3H:1V. This will be corrected in the next version of the Whale Tail Pit Waste Management Plan.	2020 Annual Report Appendix 23, Sections 5.3 and 6.3.2
CIRNAC	WT	3.2.1 Whale Tail Waste Rock Storage Facility Mitigation Measures	**Comment 1:** The Waste Rock Management Plan, Section 5.2.2.1: Whale Tail Waste Rock Storage Facility (WRSF) indicates the following: In August 2019, seepage from WRSF Pond reported through the structure towards Mammoth Lake. Immediate actions were undertaken to remediate the situation, including pumping water downstream of the structure, and maintaining the pond dry. Additional actions were taken prior to freshet 2020, to promote permafrost into the dike foundation, as well as the construction of a more robust water collection system. Refer to the Water Management Plan for additional details on water management of the Whale Tail WRSF. CIRNAC considers construction works and mitigation measures associated with water management at the waste rock structures to be significant to waste rock management, and as such suggests that actions and construction works related to the Whale Tail WRSF, the IV WRSF or the Underground WRSF be available in the Waste Rock Management Plan.	**Recommendation 1:** CIRNAC recommends that AEM include the details pertaining to the water management of the Whale Tail WRSF, the IV WRSF and the Underground WRSF in the Waste Rock Management Plan.	Details on water management related to the WT WRSF, IVR WRSF and Underground WRSF are referenced in the Water Management Plan which is also available to CIRNAC. This is made in an effort to avoid duplication of information which is a common source of error. Agnico could indicate the section of interest for easier reference.	2020 Annual Report Appendix 23, Section 5.2.2.1
CIRNAC	WT	Whale Tail Pit Waste Rock Management Plan 3.2.2 Adaptive Management	**Comment 2:** In the Waste Rock Management Plan, Section 9.4: Adaptive Management, AEM indicates that the Whale Tail Pit Expansion Adaptive Management Plan is under review, and further; "For more details on the adaptive management actions Agnico Eagle is planning to implement related to the Waste Rock Storage Facilities, please refer to the ARD/ML plan (Section 5, table 5.1)." CIRNAC notes that it is unclear how the list in Table 5.1: Anticipated ARD/ML Potential of Waste Rock Types at Whale Tail (Golder, 2018b), comprises the details of the adaptive management actions.	**Recommendation 2**: CIRNAC recommends that AEM review and update the reference to Section 5, Table 5.1, made in Section 9.4 of the Waste Rock Management Plan.	Agnico Eagle will correct the reference in Section 9.4 of the Waste Management Plan; it should refer to Section 5, Table 5.1 of the Operational ARD/ML Testing and Sampling Plan (Version 5, 2019).	2020 Annual Report Appendix 23, Section 9.4
CIRNAC	MBK/WT	Emergency Response Plan 4.1.1 Frequency of Emergency Response Preparedness (ERP) Testing Reference: Emergency Response Management Plan, Section 1.1	**Comment 1:** AEM states that Emergency Response trainings are conducted annually. In the Emergency Response Management Plan, Section 1.1, AEM's Policy Statement, the section reads as follows: "ERP will be tested on a periodic basis to ensure its effectiveness." From this statement, the frequency of testing is unclear. It is also not clear if drills are carried out to test the effectiveness of the emergency response programs, and if so, how often they are performed.	**Recommendation 1:** CIRNAC recommends that AEM revise this section to clarify the frequency of Emergency Response Preparedness (ERP) testing.	Agnico Eagle acknowledge CIRNAC's recommendation and will change the wording to 'ERP will be tested annually to ensure its effectiveness' in the next revision of the management plan.	2020 Annual Report, Appendix 31

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
CIRNAC	MBK/WT	Emergency Response Plan 4.1.2 Emergency Response Management Personnel	**Comment 2**: AEM appears to have the same emergency response management personnel responsible for the Meadowbank and Whale Tail (AMQ) sites. This arrangement could cause some confusion making the emergency response ineffective and inefficient, thereby exposing people or the environment to a greater risk. It is not clear how AEM plans to mitigate the risk posed by this arrangement.	**Recommendation 2**: CIRNAC recommends that AEM provide the rationale for how they plan for the same personnel to efficiently manage the emergency response for the two different project sites	The current system is set up to ensure that Agnico have all of the management team notified of any emergency when they are at either site. They then assemble to form a single control group that is located around two separate boardroom tables but act as a single unit and coordinate the response in the field.	2020 Annual Report, Appendix 31
NIRB	MBK	Board's recommendation Meadowbank Site – 03MN107 Incinerator stack testing and secondary chamber temperatures – Term and Condition 72	Within the 2018 Annual Report, Agnico Eagle stated that there were eight (8) times during 2018 where the temperatures did not reach 1,000°C in the secondary chamber, noting this represents 2.36 % of total burn out of the 339 days the incinerator was in operation for the 2018 year. The 2019 Annual Report states that there were 60 times during 2019 where temperatures did not reach 1,000°C in the secondary chamber, noting this represents 19 % of the total burn out of the 319 days the incinerator was in operation for the 2019 year. Agnico Eagle noted that the increase is significant and clearly shows the need to reset operating conditions of the incinerator. The Proponent links the underperformance of the incinerator to repetitive burn malfunctions and implemented a procedure to manage load capacities, as well as completed adjustments on the programming sequence. While the Proponent has also suggested other modifications to improve overall performance, there is no detail provided for the specific actions or plan that would be implemented, for the NIRB to have confidence that the incinerator will be able to consistently maintain the required burn temperature in every sequence. The NIRB also notes a previous comment from Environment and Climate Change Canada (ECCC) (February 2015) regarding low incineration temperatures, which stated: "The EC Technical Document for Batch Waste Incineration recommends that temperature in the incinerator secondary chamber remain above 1000ºC to ensure complete combustion. From the Proponent's Daily Report Logbook, for nearly one third of the burn cycles the secondary chamber temperature was reported as less than 1000ºC. The Proponent should be more vigilant to ensure that sufficient temperatures are maintained to minimize the release of contaminants to the environment."1 On September 14, 2020 the NIRB followed up with ECCC with respect to the incinerator stack testing frequency and the secondary chamber temperatures reported by the Proponent.2 On September 24, 2020 the NIRB received a response from ECCC which provided guidance and advice to the NIRB on these issues.3 With respect to incinerator temperatures, ECCC notes the decreasing ability to maintain appropriate temperatures in the secondary chamber and points to the Canadian Council of Ministers of the Environment National Guidelines for Hazardous Waste Incineration Facilities which recommend that temperatures in the secondary chamber remain above 1,000°C to ensure complete combustion of waste and minimize emissions of dioxins and furans. Considering ECCC's guidance and comments with regards to incinerator temperatures, and the increasing trend of underperformance of the incinerator in 2018 and 2019, the NIRB recommends the following:	Recommendation 1: The Proponent shall provide the Board with a detailed action plan for the modifications to the incinerator that are necessary to improve overall performance and to maintain appropriate temperatures in the secondary chamber. The action plan shall include specific steps and timelines for implementation and be provided to the Board within 60 days of the issuance of this recommendation.	In the 2019 Annual Report, based on the manual daily log sheet, there were 60 times in which the secondary chamber temperature was below the target temperature of 1000°C. However, these temperatures are recorded manually by the operator and are instantaneous values that do not represent the complete burn cycle. The current incinerator programing does not allow the primary burn to start before the temperature in the secondary chamber reaches 1000°C. During the burn, the temperature within the secondary chamber fluctuates, causing the temperature to occasionally fall below the target of 1000°C. Agnico has implemented the following actions to improve the overall performance of the incinerator and to maintain the appropriate temperature of 1000°C in the secondary chamber throughout the entire burn cycle. •Average temperature readings will be recorded automatically from the HMI into the daily reports instead of manual instantaneous readings from operators. This will reduce human error and provide a more accurate account of the temperature in the secondary chamber during the burn cycle. •The temperature in the secondary chamber will be increased to 1050°C to ensure the temperature does not fall below the recommended 1000°C at any point in the burn cycle. •The HMI will be modified to provide temperature trends throughout the burn cycle.	2020 Annual report, Section 6.2
NIRB	MBK	Board's recommendation Meadowbank Site – 03MN107 Incinerator stack testing and secondary chamber temperatures – Term and Condition 72	Within its' February 2015 correspondence, the ECCC noted that the Canada Wide Standards (CWS) for dioxins and furans states that "…where five years' data has been accumulated with all results reported below the Level of Quantification (emission standard), the stack testing frequency may be revised to a biennial schedule" so long as all subsequent test results remain below the emission standards." On August 19, 2020 The NIRB received correspondence from the Proponent, requesting a reduction to stack testing frequency from annual to biennial, based on five (5) previous years of results for dioxins and furans, and mercury below the emission standards. Although the request was initially made to ECCC, in its response to the Proponent it stated that annual stack testing is a requirement of the Term and Condition 72 of Project Certificate No. 004.4 Subsequently, ECCC noted that advice related to the Canada Wide Standards is provided to the NIRB as guidance as ECCC does not regulate air quality emissions at this time. ECCC provided further clarification on the Canada Wide Standards for dioxin and furans and for mercury in response to the NIRB's September 14, 2020 request. ECCC noted with respect to dioxins and furans, that considering one (1) test out of three (3) in 2016 did not meet the Canada Wide Standards, and noting that the Canada Wide Standards for dioxins and furans leave room for interpretation by the jurisdiction, that if the individual stack tests were used instead of the average of the three (3) tests as reported by the Proponent, that the 2016 results could be treated as the most recent exceedance. In addition, with regards to the Canada Wide Standards for mercury, ECCC notes the Canada Wide Standards state the following: "Larger facilities will be subject to annual stack testing to verify compliance with the limit…". Considering the Meadowbank facility meets the mercury Canada Wide Standard definition for a larger facility (one that handles greater than 120 tonnes of waste per year), there would be a requirement for annual stack testing for mercury emissions. Based on the guidance provided by ECCC, the Canada Wide Standards for dioxins and furans, the Canada Wide Standards for mercury, and the requirements of Term and Condition 72, the NIRB does not consider it appropriate at this time for the Proponent to reduce stack testing frequency to a biennial schedule.	Recommendation 2: The Proponent shall continue to conduct annual stack testing of the Meadowbank incinerator, and report the results of stack testing within future annual reports to the NIRB and regulators as per the requirements of Term and Condition 72 of the Project Certificate No. 004, Amendment 003.	Agnico was confident that all the regulations and criteria were met and have follow the approved Incinerator Waste Management Plan in order to reduce the stack testing frequency to biennial, following five year of compliance, and therefore stack testing was not completed in 2020. As mentioned above, Agnico Eagle sent a letter to ECCC on June 30, 2020 requesting a reduction in stack testing frequency to biennial. ECCC informed Agnico that they do not regulate air quality emissions and the information was provided to the NIRB. Agnico did not receive the NIRB Board Recommendations until December 3, 2020 and therefore did not have enough time to schedule and complete the stack testing in 2020. Agnico Eagle acknowledge NIRB recommendation and rational behind the decision and will continue to do annual stack testing in 2021 on the Meadowbank incinerator and provide the results in the annual report.	2020 Annual Report, Section 6.2
NIRB	WT	Board's recommendation Meadowbank Site – 03MN107 Continuous monitoring for nitrogen dioxide – Term and Condition 1	Term and Condition 1 of the Project Certificate No. 008, Amendment 001 requires the Proponent to implement continuous monitoring of nitrogen dioxide (NO2) downwind of mining activities as part of its' air quality monitoring program. As stated in the project certificate, the intent of the term and condition is to allow for comparison with the relevant standards, including the Canadian Ambient Air Quality Standards, and should be interpreted in accordance with the Reconsideration Report and Recommendations for the Whale Tail Pit Expansion Project Proposal (October 18, 2019). Although the amended Project Certificate did not come into effect until February 19, 2020, Agnico Eagle had reported within its' 2019 Annual Report on the location proposed for the NO2 continuous monitoring site to be constructed in 2020, and indicated through the 2020 Site Update Report that it intends on installing the monitoring location by the end of 2020. As noted by ECCC, the proposed location is approximately 30 kilometres from the Whale Tail Pit site and therefore it is unlikely that the project activities will influence the ambient NO2 measured at this location. Additionally, the presence of a diesel generator 200 metres upwind of the proposed location could influence the measurements. ECCC has recommended that the NO2 continuous monitoring site be: located at least within 10 kilometres of project activities to allow for effective comparison with FEIS predictions; that the diesel generator required for power of the site be located to avoid influence of emissions; and that the continuous monitoring location be co-located with a passive NO2 sampler. While the NIRB acknowledges Agnico Eagle's response, indicating its position that the monitoring location is appropriate and will provide regional NO2 concentrations not unduly influenced by a single facility, the NIRB notes this perspective differs from the intent of the term and condition, as described by the Board within its Reconsideration Report and Recommendations: "To ensure that monitoring methods accurately capture potential increases to air emissions that could have effects on workers, wildlife or the terrestrial environment, the Board recommends a revision to the terms and conditions requiring the following (see Section 8.2 for the complete wording of the recommended terms and conditions): •Continuous nitrogen dioxide monitoring for the purposes of comparing the results to the FEIS Addendum predictions and relevant standards. As commented on by Intervenors, the Board agrees that for the Expansion Proposal the relevant standards for air quality include the Canadian Ambient Air Quality Standards."5 The NIRB also reminds the Proponent of ECCC's recommendation during the Public Hearing, in part which stated: "…to include continuous nitrogen dioxide monitoring for the purposes of comparing the monitoring results with the levels predicted in the impact assessment and relevant guidelines."6 It is clear from discussion at the Public Hearing for the Whale Tail Pit Expansion Project and the Board's decision that the intent of the term and condition was to not only allow for comparison of monitoring results with the Canadian Ambient Air Quality Standards, but also with the FEIS Addendum predictions. The Board considers that it is appropriate to locate the continuous NO2 monitoring site at an appropriate distance downwind of the Whale Tail mining activities to capture potential increases to air emissions as a result of the Expansion Project activities. The NIRB also notes that discussion at the Public Hearing touched on the co-location of a passive sampler with the continuous NO2 monitoring site, to assist in validating measurements from passive samplers. Additionally, the revised Term and Condition 1 which added the requirement for continuous NO2 monitoring, does not negate the other requirements of the term and condition, specifically 1.b, which requires the Proponent to demonstrate through active and passive monitoring that concentrations of NO2 (among other potential contaminants) remain within predicted levels. Proper data collection is essential in order to achieve the term and condition, assist in the determination of predicted emissions, and meet the Canadian Ambient Air Quality Standards.	Recommendation 1: The Board requests the Proponent consult Environment and Climate Change Canada to determine an appropriate location for the continuous NO2 monitoring and associated passive monitoring downwind of mining activities. The Proponent shall report to the NIRB on the results of its consultations with Environment and Climate Change Canada and	: Agnico would like to refer to the response provided on August 21, 2020 'Agnico Eagle's response to Meadowbank (03MN107) and Whale Tail (16MN056) 2019 Annual Report comments Part 2' which detailed the rational for this chosen location. at kilometer 132 along the WTHR. Agnico is of the opinion that the current location respects all of the conditions required by the TC No.1 and respects all discussions held during the permitting process. The chosen location is being implemented and will be fully functional in 2021. Agnico will contact ECCC, as recommended by the NIRB, and will provide update of the discussion.	2020 Annual Report, Appendix 46

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
NIRB	WT	Board's recommendation Meadowbank Site – 03MN107 Suppression of surface dust – Term and Condition 2	Term and Condition 2 of Project Certificate No. 008 for Whale Tail Pit requires Agnico Eagle to verify commitments to the utilization of dust suppressants along not only the all-weather access road (AWAR), but the Whale Tail haul road (WTHR) and any other roads and trails associated with the Whale Tail Pit Project. Term and Condition 2 also stipulates that the Monitoring Plan (Air Quality and Dustfall Monitoring Plan) shall include a description of the type of suppressant to be utilized and the frequency and timing of application to be made throughout the various seasons of road use. Regarding this issue in previous years, the Board has noted that dust suppressants are not and have not been applied to the entire length of the AWAR as intended by Term and Condition 74 of the Project Certificate No. 004. The NIRB acknowledges that Agnico Eagle applied dust suppressant once during the summer 2019 on the WTHR at three (3) locations coinciding with the dustfall monitoring transects. The monitoring results from the WTHR in 2019 indicate that the majority of samples exceeded Final Environmental Impact Statement predictions within 100 m of the Road, and occasional exceedances occurred for one (1) location at 300 m from the Road. The Board's 2019 Recommendation #1 required the Proponent to update its Air Quality and Dustfall Monitoring Plan to include dust suppression application on the entire length of all surface/project roads used by Agnico Eagle for the Meadowbank Gold Mine and Whale Tail Pit Projects, and to include timelines and triggers for adaptive management. In response, the Proponent committed to provide the updated plan in the 2019 Annual Report that would "clearly include all the recommendations/commitments received from both operation and permitting process". After review of the Air Quality and Dustfall Monitoring Plan, Version 5, 2020, it does not appear that the Proponent has updated the plan as committed. The dust suppressant locations for the AWAR remain consistent with previous years (five (5) sections totalling <10% of the AWAR length). The plan also does not discuss any commitments to apply dust suppressant along the entire length of the WTHR, but rather relies on visual observations of the Agnico Eagle road supervisor. The NIRB is encouraged that Agnico Eagle has included numeric thresholds based on Alberta Ambient Air Quality Guidelines to determine when mitigation measures need to be initiated based on results of dustfall sampling, however the numeric thresholds are based on 30 day averages. It is unclear how mitigation measures such as dust suppressant could be applied in a timely manner to prevent impacts occurring given this time period for monitoring results to become available (collected twice per summer). The NIRB highlights that there is no clear commitment to the utilization of dust suppressant along the entire length of all project surface roads within the monitoring plan. During the community information session that the NIRB hosted in Baker Lake community members expression concern regarding the lack of dust control along the AWAR both for travel and how much dust is observed on the snow. One commenter noted that the primary wind direction is from the northwest which means dust from the road may be blowing southeast to areas where community members collect ice and water regularly. Therefore, the Proponent has not fully met the requirements of Term and Condition 2 or 74 of the Whale Tail Pit or Meadowbank Gold Mine Project Certificates, as dust suppression techniques were not applied along the entire length of all project surface roads. The Proponent has not demonstrated that it intends to fulfill the requirements of the terms and conditions, nor of the commitments made through the associated assessment processes.	Recommendation 2: The Proponent shall revise the Air Quality and Dustfall Monitoring Plan, to reflect the requirements of the Term and Condition 2 of Project Certificate No. 008. The Proponent shall also clarify to the Board how the numeric thresholds proposed will be able to trigger an adaptive management response in time to prevent impacts from occurring. The revised Air Quality and Dustfall Monitoring Plan and requested clarification shall be provided to the NIRB within 60 days of the issuance of this recommendation. Recommendation 3: Additionally, the Proponent shall provide an action plan to explore the development of a community-based monitoring program, in consultation with the Hamlet of Baker Lake and the Baker Lake Hunters and Trappers Organization. The purpose of the program would be to ensure that community concerns regarding dust produced by Project roads are incorporated directly into the monitoring and implementation of mitigation measures. The requested action plan shall be provided to the Board within 60 days of the issuance of this recommendation	**Recommendation 2:** Agnico Eagle has revised the Air Quality and Dustfall Monitoring Plan in 2020 and is of the opinion that the updated plan satisfied the requirement of Term and Condition 2 of project Certificate No. 008. The threshold were initially presented in response to ECCC-TC5 in May 2019 along with an updated version of the management plan (Version 4.1, May 2019). Agnico never received any comments regarding this updated version and threshold proposed. There is actually no standards for dustfall available for Nunavut. Results of the dustfall analysis for transects along the AWAR and the WTHR are compared to the Alberta Ambient Air Quality Guideline for residential and recreational areas of 0.53 mg/cm2/30-days. As stated in the Alberta Air Quality Guidelines, guidelines may be used for airshed planning and management, as a general performance indicator and to assess local concerns. Based on this guideline, Agnico is of the opinion that the intent to compare to the 30 days average is sufficiently adapted. Sampling is conducted over this period to allow for a sufficient sample size for analysis, and as a result it provides an indication of longer-term air quality trends. Agnico would also like to mention that dust suppression was applied almost on the entire length of the WTHR in 2020. Air quality results will be provided as part of the 2020 Annual Report. In 2021, dust suppression is planned to be added again on almost the entire length of the WTHR with a second application in some specific sections, as needed. Based on the above information, Agnico will not submit an updated Air Quality and Dustfall Monitoring Plan as it was recently revised in March 2020. **Recommendation 3:** Agnico Eagle acknowledges the NIRB recommendation and will assess the development of a community based monitoring program. Agnico would first like to have a meeting with the Hamlet Hunter and Trappers Organization and community of Baker Lake to hear about their concerns, if any. A specific action plan will be establish following this first meeting and communicated to NIRB via subsequent annual report. Agnico would also like to mention that in the past, consultation with the Hamlet was conducted to identify major areas of concern along the AWAR. Five areas were identified and Tetraflake (CaCl2) is applied twice a year during the summer to mitigate dust in those areas.	2020 Annual Report, Section 8.14.2.2 and Appendix 46
NIRB	WT	Board's recommendation Meadowbank Site – 03MN107 Monitoring for methylmercury in fish tissue – Term and Condition 63	Term and Condition 63 requires the Proponent to conduct studies that monitor methylmercury concentrations (including in fish tissue), with an assessment of potential risk to people from consumption of fish. In the 2019 Annual Report, the Proponent stated that mercury and methylmercury were analysed as part of its Mercury Monitoring Plan for Whale Tail South Area (Appendix A, CREMP Addendum). 2019 monitoring results indicate a substantial (~40 times) increase to total mercury, and similar increases to levels of methylmercury across all water sampling stations. The Proponent noted that it is working to verify the accuracy of the 2019 results and further sampling in 2020 will assist in determining the cause. It is also noted that no fish tissue sampling occurred in 2019 and the Proponent noted that risk-based analyses would be implemented should monitoring results exceed model predictions for fish tissue concentrations. It is also noted the current Mercury Monitoring Plan does not include an assessment of risk to human health from the consumption of fish on an ongoing basis. Similar to Crown-Indigenous Relations and Northern Affairs Canada's Recommendation #9 on the Proponents' 2019 Annual Report, the NIRB notes that given the spike in mercury and methylmercury concentrations in the Whale Tail Lake south basin area, the absence of fish tissue sampling in 2019, and the lack of risk assessment for human health from the consumption of fish in the Project area, that potential impacts may not be monitored appropriately. Additionally, the Proponents conclusion that the approach is supported by low rates of fishing by local residents in the Project area, is not respectful of the substantial concerns voiced by land users during the NIRB's Review process for the Whale Tail Pit Project.	Recommendation 4: The Board requests that the Proponent report on the accuracy of measured mercury concentrations as soon as the outcome is available. Should the Proponent conclude that the spike in mercury concentrations is accurate and exceeds Final Environmental Impact Statement predictions, the Proponent shall conduct and provide the human health risk assessment within its' 2020 Annual Report. Recommendation 5: Agnico Eagle shall clarify why small-bodied fish (slimy sculpin and/or ninespine stickleback) tissue sampling did not occur in 2019 in accordance with the Mercury Monitoring Plan (Version 2, March 2019) and why an assessment of risk to human health from the consumption of fish is not included in the Mercury Monitoring Plan. The Proponent shall provide its response within 60 days of issuance of this recommendation.	**Recommendation 4:** The 2019 water samples that showed substantial increases in total mercury are invalid due to cross-contamination that occurred while the samples were being stored in a refrigerator at Dr Swanson's lab at the University of Waterloo. The source of the mercury contamination is believed to be historical, from a thermometer that broke prior Dr. Swanson taking possession of the fridge. A thorough assessment of the extent of mercury cross-contamination confirmed that the source was confined to the fridge and hadn't spread to other areas of the lab. The fridge was discarded prior to arrival of the samples from the 2020 field season. Therefore, the spike in mercury concentration is inaccurate. **Recommendation 5:** Small-bodied fish (sculpin and stickleback) were collected in 2018, 2019, and 2020 as per the Mercury Monitoring Plan (Version 2, March 2019). Samples from 2018 and 2019 were archived until the 2020 small-bodied fish sampling program was completed. Sculpin and stickleback samples from 2018, 2019, and 2020 were selected for analysis to help assess temporal and spatial changes in fish Hg concentrations and potential differences in Hg accumulation between benthic (sculpin) and pelagic (stickleback) fish species. Agnico will provide the results of the sampling program in the annual report. As per the approved Mercury Monitoring Plan a detailed human health risk assessment will be undertaken if fish mercury concentrations exceed concentrations predicted in the Azimuth 2017 report.	NA
NIRB	WT	Board's recommendation Meadowbank Site – 03MN107 Helicopter traffic monitoring and reporting	: Commitment #20 from the Public Hearing for the Whale Tail Pit Project states the following: "The Proponent shall revise the Project's TEMP to include a program to monitoring and report helicopter traffic associated with the Whale Tail project (including existing Meadowbank infrastructure) and all associated exploration activities so that the spatial scale and intensity of this activity can be documented. This should include the collection and analysis of GPS track logs for all helicopter flights contracted by the Proponent." Similar to the Government of Nunavut's (GN) comment and Recommendation #1 on the Proponent's 2019 Annual Report, the NIRB did not find information in the Terrestrial Ecosystem Management Plan (TEMP) (2019 Wildlife Monitoring Summary Report) on helicopter traffic as per the commitment. As written in Section 3.4 of the Project Certificate No. 008, the Proponent will fulfill all commitments made during the Final Hearing, as the Board's decision relied on that commitment to ensure that concerns of parties and the public were addressed, and that potential impacts were appropriately monitoring and mitigated. Further, Term and Condition 28 states that the TEMP shall demonstrate consideration for all relevant commitments made by the Proponent throughout the NIRB's Review of the Whale Tail Pit Project. As further noted by the GN, the Proponent has neglected to fulfill this commitment in 2018 and 2019 through three (3) subsequent revisions of the TEMP. The Board is aware that discussions have been occurring via the Terrestrial Advisory Group, and that Agnico Eagle provided clarification for its lack of monitoring being due to "infrequent and sporadic use of helicopters". The Board is concerned that helicopter traffic is not being monitored as required and that helicopter traffic is going undocumented, leading to parties inability to verify the Proponent's assertion of infrequent helicopter traffic or determine if any potential impacts to wildlife are occurring.	Recommendation 6: The Board recommends the Proponent work with the Government of Nunavut and the Terrestrial Advisory Group, as per Term and Condition 27 and 28, of the Project Certificate No. 008 to revise its Terrestrial Ecosystem Management Plan to incorporate the requirements of Commitment #20. The Board expects that the revisions will include the program to monitor and report helicopter traffic associated with the Whale Tail Pit Project, and that this information will be reported as part of future Wildlife Monitoring Summary Reports. The Proponent shall provide the requested updates within the next revision of the Terrestrial Ecosystem Management Plan, as approved by the Terrestrial Advisory Group members, and shall report on the implementation of this recommendation within the 2020 Annual Report.	Agnico would like to refer to the response provided regarding TEMP V8 (19124290-490-TM-TEMP V8 Comment_Response_AEM_Rev1 submitted on July 13, 2020). Agnico acknowledges NIRB recommendation will continue to work with the TAG members to have this issue resolved in 2021	NA

Authority	Site	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagles Response to Initial Comments	2020 Annual Report Section were comments were addressed
NIRB	MBK	Annual Monitoring Report Meadowbank Site Managing attraction of carnivores and/or raptors – Condition 25	Condition 25 requires the Proponent to manage and control waste in a manner that reduces or eliminates the attraction of carnivores and/or raptors to the site. In addition, the Proponent is required to employ legal deterrents to carnivores and/or raptors at all landfill and waste storage areas. In 2019, during the NIRB site visit, staff did not observe wildlife deterrents for the Meadowbank Gold Mine Project (landfill, waste storage areas, or fuel tank farm at Baker Lake). The resulting Board Recommendation #1 in 2019, requested the Proponent to provide an explanation for lack of deterrents in place at the Baker Lake fuel tank farm or Quarry 22, and to propose a timeline for the remediation of quarry sites along the AWAR that have been used by raptors for nesting. The Proponent's response indicated a commitment to employing approved deterrents for carnivores at the Meadowbank landfill, as well as reinstalling deterrents at the Baker Lake fuel tank farm. The NIRB confirms that Agnico Eagle has reinstalled bird deterrents at both the Baker Lake Marshalling Facility and the Meadowbank Fuel Tank Farm (see Section 3.4; or 2020 Site Update Report8). Additionally, the Proponent committed that deterrents would be installed before the next 2020 nesting season in Quarry 22 to allow for continued remediation, however stated that remediation for quarries along the AWAR was not planned until 2031-2032 according to the ICRP and therefore presence of raptors is not a concern for these locations at this time (see Section 3.5.2 for a discussion of progressive reclamation and updates to the ICRP). Review of the 2020 Site Update Report notes that the Proponent installed a deterrent and bird cannon at Quarry 22 in 2020, but had to remove as they were ineffective. The NIRB will review the results of deterrent placement and effectiveness in the Proponents 2020 Annual Report in fulfillment of the Board's 2019 Recommendation.		Agnico acknowledges the NIRB recommendation and will provide additional information regarding wildlife deterrents in the 2020 Annual Report.	2020 Annunal report, Section 8.18
NIRB	MBK	Annual Monitoring Report Meadowbank Site Placement of local area marine monitors – Condition 36	Condition 36 requires that Agnico Eagle place/hire local area marine mammal monitors onboard all vessels transporting fuel or materials for the Project through Chesterfield Inlet. Although approximately 56 ships with fuel and goods ingress/egress at Baker Lake from Chesterfield Inlet in 2018, only one (1) marine mammal monitor was hired for a period between August 6 to August 23, 2018. In 2019, Agnico Eagle reported approximately 58 ships, of which again only one (1) local marine monitor was hired for a period between September 19 to 24, 2019. In response to the Board's 2019 Recommendation #2 around this concern, the Proponent outlined an action plan to meet the term and condition, including additional recruitment efforts, and the alternative to hire from other communities within the Kivalliq region, or to supplement coverage with locally hired Agnico Eagle staff already employed by the Proponent's Environmental Department. The NIRB looks forward to reviewing the results of the Proponents progress towards meeting this term and condition within its 2020 Annual Report.		Agnico acknowledges the NIRB's comment. Due to the COVID 19 pandemic in 2020, there were no locally hired individuals for marine mammal monitoring. Therefore, the shipping company completed the monitoring in 2020. Once the COVID 19 pandemic is resolved, Agnico will continue to use local individuals to complete the marine mammal monitoring onboard vessels. Results of the 2020 monitoring program will be provided in the 2020 Annual Report.	2020 Annual Report, Appendix 57
NIRB	MBK	MAnnual Monitoring Report Meadowbank Site inimum flight altitudes – Condition 61 and 62 F	Condition 61 requires updates to the Terrestrial Ecosystem Management Plan (TEMP) to include minimum flight altitudes for migratory birds, but also stipulate the use of flight corridors to avoid areas of significant wildlife importance, where 'significant wildlife' is defined to include ungulates, raptors, predatory mammals, and migratory birds. The condition is to be read together with Condition 62f, which requires the Noise Monitoring and Abatement Plan to include minimum flight altitudes of 610 metres when flights are passing sensitive wildlife and birds. The commentary associated with the condition is clear that the Proponent should demonstrate how these requirements are communicated to pilots. While the Noise Monitoring and Abatement Plan (Version 3, 2018) appears to include the required flight altitude. In contrast the TEMP states a minimum altitude of 300 metres is followed for caribou, muskox, and other wildlife for flights to and from the mine site.	The Proponent shall clarify the discrepancy between the minimum flight altitudes between the TEMP and Term and Condition 61. The NIRB also requests information on how flight corridors are being used according to the Condition and how the direction of both Condition 61 and 62f for minimum flight altitudes is communicated to aircraft pilots for implementation.	The 300 m altitude stated in the TEMP Version 7 is the minimum altitude to avoid disturbance to caribou, muskox, and other wildlife. In the Noise Monitoring and Abatement Plan Version 3, 610 m is the altitude to avoid sensitive bird/wildlife areas. Pilots flying aircrafts to and from the mine site are to keep a vertical distance of 1000 m and 1500 m horizontal distance from groups of 50 or more caribou and 10 or more muskox. For large groups of migratory birds, the minimum vertical distance is 1100 m and 1500 m horizontal. These minimum vertical and horizontal distances meet the requirements of Condition 61. This information is provided to all pilots flying aircrafts to and from the mine site via a memo in which requires each pilot to sign. Helicopter pilots are asked to avoid helicopter flights over known areas of raptor nests, molting snow geese (during molting period (July-August)), waterfowl and shorebird staging areas during critical seasons (when birds are present –spring and summer months). The Environment Department informs pilots of these areas. If maintaining this altitude is not possible, they must maintain a horizontal distance of at least 1,500m from key sites.	2020 Annual Report, Appendix 47
NIRB	WT	Annual Monitoring Report Meadowbank Site Noise Monitoring	The 2019 Annual Report noted that although noise monitoring was conducted according to the Noise Monitoring and Abatement Plan (Version 3, 2018) for noise monitoring stations R6 – R11, an error in settings resulted in no sound levels logged for the duration of the field season at R7 – R11. The Proponent's PEAMP Evaluation acknowledges that monitoring in 2019 did not effectively address FEIS predictions, however moving forward the operation error will be corrected and therefore the overall monitoring program is considered effective. The Proponent does not elaborate on the corrective measures that would be employed to ensure the noise monitoring program is implemented effectively. The NIRB highlights the importance of proper and complete data collection in order to ensure that potential impacts are being appropriately monitored and mitigated, and that the Proponent is able to provide a timely adaptive management response should noise levels be measured that exceed FEIS predictions.	The NIRB requests the Proponent provide details on the corrective measures it has taken to ensure this type of operation error does not occur in future in the 2020 Annual Report and/or the next revision of the Noise Monitoring and Abatement Plan.	In 2020 Agnico implemented corrective measures to ensure data was logged properly so that FEIS predictions could be appropriately addressed. The corrective actions involved changing the settings on the sound meters and implementing a QAQC program. The QAQC program involved completing a noise data collection trial and evaluating the data to ensure the data was being recorded and the meter was working properly prior to deployment of the meter in the field. Results of the noise monitoring completed in 2020 will be provided in the 2020 Annual report.	2020 Annual Report, Section 8.13 and Appendix 49
NIRB	MBK	Interim Closure and Reclamation Plan	In 2019 the NIRB noted that the Meadowbank Gold Mine Project was reaching the end of its predicted mine life, and that Agnico Eagle had effectively completed active mining at the Meadowbank site. The NIRB noted that limited detail had been provided by the Proponent on opportunities for progressive reclamation and further requested that the ICRP be updated to a Final Closure and Reclamation Plan in accordance with Term and Condition 78 and 79 of the Project Certificate (see Table 11 of this report). The Proponent has noted that it considers the Meadowbank site to still meet the criteria for 'operations' due to continued use of the Meadowbank infrastructures for the Whale Tail Pit Project. The NIRB would highlight a commitment from the Public Hearing for the Meadowbank Gold Mine Project as appended to the Project Certificate No. 004 (Appendix A, Commitment #19) which states "Consult with stakeholders and update its reclamation and closure plan with the final design for decommissioning once this information becomes available" and that the timing for implementation of this commitment was 'operations'. The NIRB also notes that CIRNAC has made recommendations to the Proponent on its' 2017, 2018, and 2019 Annual Reports regarding provision of more details of progressive reclamation within the ICRP. While the NIRB acknowledges that the Proponent has made some updates to its ICRP submitted as part of the 2019 Annual Report, there remains insufficient detail to demonstrate the Proponent's commitment to progressive reclamation, or to fully understand work completed to date.	The NIRB is requesting Agnico Eagle provide additional detail on progressive reclamation work completed for the Tailings Storage Facility and Waste Rock Storage Facility at the Meadowbank mine site and include more details on the specific timelines for planned progressive reclamation opportunities. The NIRB requires the updated ICRP to be provided in the 2020 Annual Report.	Agnico acknowledges the request and will provide more details on progressive rehabilitation in the 2020 Annual Report. Details related to work completed and schedules of progressive reclamation is included in the closure schedule presented in Appendix P of the ICRP which was updated in March 2020 and provided in the 2019 Annual Report in Appendix 55. Agnico is of the opinion that the last update March 2020 version fulfill the current request	2020 Annual report, Section 9
NIRB		Terrestrial Ecosystem Management Plan	However, the NIRB notes through review of the 2019 Annual Report, parties' comments, and the Proponent's responses, that there appears to be inconsistency with regards to the version of the TEMP that is referenced to apply. Additionally, it is unclear in certain scenarios which version of the TEMP was being implemented. The NIRB would clarify that with regards to assessing compliance with the Project Certificate terms and conditions, the NIRB refers to the final version(s) of the plan as submitted prior to or within that monitoring year. For example, in the 2019 monitoring year, two (2) versions of the TEMP were in implementation: TEMP Version 6, December 2018; and TEMP Version 7, June 2019 (into effect after submitted to the NIRB). As the Proponent has retracted the TEMP Version 8, it is not considered in effect, and the NIRB expects that the Proponent continued to apply monitoring and mitigation measures consistent with the TEMP Version 7 from its submission to such time that the next revision is finalized by the TAG and received by the NIRB.	The NIRB requests the Proponent to ensure that future submissions of relevant updates to monitoring and mitigation plans are clearly noted to be finalized versions. The NIRB requires that the Proponent clearly state which plan version is being implemented, to avoid future confusion with regards to assessing compliance.	Agnico acknowledges the NIRB's request and will clearly indicate the current plan version moving forward. The current TEMP used for operation is version 7.	2020 Annual Report, Appendix 47