

Appendix 3

NWB 2023 Annual Report Commitments

Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2024 Annual Report Section
NWB	Management Plans	2023 Annual Report	The Board suggests that the Licensee submit separately, for review and/or approval, the management plans that have significant updates. For the plans that do not have any significant updates or revisions, can be submitted with the next Annual Reports. All plans submitted for review will include a version control section, clearly stating the nature of changes in the plan, and identification within the document highlighting where changes have been made.		Agnico Eagle will continue to submit Management Plans that have significant updates separately to the NWB for approval as indicated under Part B Section 13 of the 2AM-MEA1530 and 2AM-WTP1830 Water Licences. For example, the Whale Tail Water Management Plan, Version 13.1 and Waste Rock Management Plan, Version 13 were submitted alongside the 2024 Modification in July 2024 and subsequently approved by the NWB. Plans with minor revisions as required by changes in operations and/or technology will continue to be submitted alongside the Annual Report as indicated under Part B Section 16 of the 2AM-MEA1530 Water Licence and Part 8, Section 17 of the 2AM-WTP1830 Water Licence. Agnico Eagle will ensure that the document control section is thoroughly updated for each submitted Plan.	Document Control of each individual management plan submitted as part of the 2024 Meadowbank Complex Annual Report
CIRNAC	Water Quality Prediction Methods	2022 Annual Report Appendices 13 and 14	<p>CIRNAC's review of the 2022 Annual Report contained comment #8 (R-08), which provided a number of recommendations related to the water quality predictions for the Meadowbank and Whale Tail projects. The specific request was as follows:</p> <p>"CIRNAC recommends that Agnico Eagle revisit the water quality modelling assumptions and approaches used for both Meadowbank and Whale Tail within the next 120 days to ensure all future project decisions (particularly closure) are informed by sufficiently accurate predictions. At a minimum, factors to consider when revisiting the assumptions and approaches include the following:</p> <ul style="list-style-type: none"> a) using monthly (or smaller) time steps for all model inputs instead of the current one-year time step; b) performing hydrodynamic modelling of receivers instead of assuming fully mixed conditions; c) performing sensitivity analyses to accurately capture the range of uncertainty associated with water quality predictions; d) expanding efforts to characterize loadings from pit walls." <p>CIRNAC reviewed AEM's response to the above-noted recommendations as well as the updated water quality predictions for the Meadowbank and Whale Tail sites, as presented in Appendices 13 and 14 of the 2023 Annual Report. Based on that review, CIRNAC concludes that the status of the recommendations are as follows:</p> <ul style="list-style-type: none"> a) Unresolved – Based on its review of the updated water quality predictions, CIRNAC understands that this recommendation has not yet been acted on. b) Unresolved – The updated water quality predictions do not include hydrodynamic modelling of water quality concentrations. The updated water quality prediction reports include statements such as: "The present mass balance model cannot simulate the treated effluent plume discharged in Kangisuluk Lake or Whale Tail South Lake. A hydrodynamic model is required to simulate the discharge of treated effluent in these lakes, which is beyond the scope of this study." c) Partially resolved – The updated water quality predictions include sensitivity analyses to address the implications of dry years. However, the predictions do not address the uncertainty within a broad range of other model inputs (e.g., contaminant source terms). d) Partially resolved – The updated water quality predictions have incorporated recent monitoring data from pit sumps. However, there continues to be uncertainty regarding loadings from pit wall seeps. The following recommendation reiterates CIRNAC's request to address the unresolved and partially resolved items noted above. For additional details on the rationale for the request, please refer to CIRNAC Comment #8 (R-08) on the 2022 Annual Report. 	<p>CIRNAC recommends that AEM revisit the water quality modelling assumptions and approaches used for both Meadowbank and Whale Tail within the next 120 days to ensure that all future project decisions (particularly closure) are informed by sufficiently accurate predictions. At a minimum, factors to consider when revisiting the assumptions and approaches include the following:</p> <ul style="list-style-type: none"> a) using monthly (or smaller) time steps for all model inputs instead of the current one-year time step; b) performing hydrodynamic modelling of receivers instead of assuming fully mixed conditions; c) performing sensitivity analyses to accurately capture the range of uncertainty associated with water quality predictions; and d) expanding efforts to characterize loadings from pit walls. 	<p>Agnico Eagle appreciates CIRNAC's recommendations regarding the water quality modelling approach and assumptions for Meadowbank and Whale Tail. As closure approaches, new mandates to further refine our water quality forecasting have been initiated. These new models integrate recommendations a), c), and d) (monthly time steps for all model inputs, sensitivity analyses, and characterizing pit wall loadings), and will be gradually included in the 2024 and 2025 Annual Report. Agnico Eagle would like to note the current water quality model does account for pit wall loadings within the source terms and work is ongoing since 2022 to collect additional in-situ water quality data from the walls at Whale Tail Pit and IVR Pit to integrate in the water quality modelling.</p> <p>As for recommendation b) (hydrodynamic modelling of receivers), based on the CREMP program results at the Whale Tail Mine, samples taken near the discharge points in Kangisuluk Lake and Whale Tail South Lake match the FEIS concentrations predictions for phosphorus and arsenic and in some cases are lower. At this point there is no evidence to suggest a need for this level of modelling. This will be reviewed annually and evaluated if deemed necessary based on monitoring results.</p>	Water Balance and Water Quality Model Report (appendix of the 2024 Water Management Plan) for Meadowbank and Whale Tail in Appendices 13 and 14 of the 2024 Meadowbank Complex Annual Report.
CIRNAC	Updated Management Plans - Report Improvements		<p>CIRNAC has carried out a high-level review of these plans as submitted in Section 10 of the 2023 Annual Report. Based on this review, it is CIRNAC's opinion that the plans generally appear to be appropriate for the nature and scale of the operations within the context of the local and regional setting and the stage of the mine life cycle operation of each of the respective operations.</p> <p>However, CIRNAC notes that the document control descriptions of revisions range from non-existent or inadequate to excellent, providing either no meaningful guidance for reviewing changes, or allowing for the effective understanding of revisions that have been made.</p> <p>It is CIRNAC's opinion that the plans listed below fall short of the NWB requirements for document control revision updates.</p> <p>Revised Management Plans Applicable to Meadowbank and Whale Tail</p> <ul style="list-style-type: none"> •Emergency Response Plan, V18 (Appendix 46) - the document has no cover sheet and has no formal "Issued Date", it has a "printed date of 30-08-2023," but as noted in the document, "it is an uncontrolled document if printed". There is no document control section or version history. •Blast Monitoring Program, V9-Rev1 (Appendix 33) dated March 2024 - the document control states "all sections," update to lake names and monitoring stations. Revised Management Plans Applicable to Meadowbank Operations •Dewatering Dikes Operation, Maintenance and Surveillance Manual, V11 (Appendix 28) dated January 2024 - the document control states "All - Annual Update". •Tailings Storage Facility OMS, March 2023 V14 (Appendix 29) dated January 2024 - the document control states "All - Annual Update". Revised Management Plans Applicable to Whale Tail Operations •Whale Tail Water Management Infrastructure Operation, Maintenance and Surveillance Manual, V4 (Appendix 30) dated January 2024 - the document control states "All - Annual Update". •Whale Tail Water Management Plan, V12 (Appendix 14) dated March 2024 - the document control indicates that all pages were updated to reflect current operations/water management and to comply with commitments and requests. <p>2024 Modification Request for 2AM-WTP1830</p> <p>On May 06, 2024, NWB received a modification request from Agnico Eagle regarding the updated plans:</p> <ul style="list-style-type: none"> •Water Management Plan Version 13 •Waste Rock Management Plan Version 13 <p>The board requested to take into account Version 13 of the plans when submitting comments for the 2023 annual report. This was in addition to Version 12 of these management plans that were already reviewed. Given the lateness of the request with respect to the submission timeline for the Annual Report review, CIRNAC attempted to conduct a high-level review to identify the main updates to the Plans. The thoroughness of CIRNAC's review was entirely dependent upon adequate guidance provided by within the revisions in the Document Control of each management plan. This would facilitate the review and help identify changes made specific to the Modification. However, the guidance in every case was very vague, citing updates to the entire plan to include the 2024 Modification and water quality forecast (Water Management Plan) and updates throughout to align with the mining extension to 2028 (Waste Rock Management Plan).</p> <p>Given the constraints mentioned above, at this time, CIRNAC has unable to review Version 13 of the Waste Rock and Water Management Plans. As a result, CIRNAC suggests Agnico Eagle resubmit version 13 of these plans with proper document control highlighting the changes compared to version 13 of these plans (submitted on June 2023). At a minimum, any modification to the plans should mention the updated sections and page numbers in the document control section and updates flagged, such as an arrow within the body of the report.</p>	<p>CIRNAC recommends that Agnico Eagle:</p> <ul style="list-style-type: none"> a) Review its overall approach in recording revision updates for Management Plans to ensure that document revision updates are meaningful and in keeping with the NWB requirements, i.e., are as precise as possible with respect to the specific nature of the revision and where the revisions were made, b) Resubmit Version 13 of the Water Management Plan and Waste Rock Management Plan with proper document control highlighting the changes compared to version 11 of these plans submitted in June 2023. c) List the updated sections and page numbers in the document control section for any updates/revisions of a plan. Also, use an arrow within the body of the plan/report and appendices to facilitate the identification of changes in referenced sections of the document. 	<p>Agnico Eagle acknowledges CIRNAC's comment regarding visibility of revision updates to Management Plans and will ensure that future submissions include more precise details on changes to the Plan within the document control section. Updates to document control will include more detailed information on revised sections and page numbers so that changes to the document can be well identified.</p> <p>The Whale Tail Water Management Plan, Version 13.1 and Waste Rock Management Plan, Version 13 that were submitted alongside the 2024 Modification in July 2024 and subsequently approved by the NWB in August 2024, indicated clearly in the document control section and in the margins of the body where changes to the document were made.</p>	Document Control of each individual management plan submitted as part of the 2024 Meadowbank Complex Annual Report
DFO	Fish Passage at Road Crossings	Appendix 7: Meadowbank and Whale Tail 2023 Annual Geotechnical Inspection; Appendix 10 - Meadowbank and Whale Tail 2023 Annual Geotechnical Recommendation Implementation Plan; Appendix 31: Whale Tail 2023 Report on the Implementation of Measures to Avoid and Mitigate Serious Harm.	<p>: Culverts crossing fish bearing waters along the AWAR and WTHR requiring repair maintenance.</p> <p>The annual report does not identify issues with culverts affecting fish passage. The annual report does not provide a plan for repair/replacement. This was a commitment made by the proponent in response to comments on the 2022 Annual Report.</p> <p>Appendix 10 - Meadowbank and Whale Tail 2023 Annual Geotechnical Recommendation Implementation Plan; states that along the AWAR "Close monitoring of the culverts will be performed by AEM at freshet..." which has "not started."</p>	<p>Proponent to provide a list of culverts along the WTHR and AWAR which cross fish bearing waters and if these require repair or replacement. Proponent to provide a plan for repair or replacement of damaged and obstructed culverts prioritizing repairs to culverts with potential to affect fish passage and those affecting fish and fish habitat.</p>	<p>Agnico Eagle provided to DFO in 2023, a detailed list of all culverts along both roads for that are considered fish bearing.</p> <p>Agnico Eagle hired a subject matter expert to perform culvert stream assessment along the WTHR and AWAR. Field work took place at freshet 2024 and the conclusion of the assessment will be available later in 2024. Agnico Eagle will ensure to contact and collaborate with DFO once the conclusions of the assessment are available and will discuss any further actions, as needed.</p> <p>Obstructed and damaged culverts are listed in the Annual Geotechnical Inspection Report. It may be specified into future Geotechnical Inspection reports if the culvert is fish bearing. As per this report, if insufficient capacity to handle the flow is observed at locations where culverts are obstructed or damaged, Agnico Eagle will implement a plan to clear the obstruction, repair or replace the culvert. No issues with the capacity to handle the flow has been observed where the culverts are damaged or obstructed during freshet 2023.</p>	Section 8.5.5 of the 2024 Meadowbank Complex Annual Report
KivIA	Portage Pit B and B Dump	Appendix 8 – Meadowbank 2023 Annual Open Pit Geomechanical Inspection; Table 2 – 2023 Annual Open Pit Geomechanical Inspection, Summary of Recommendations.	The 2023 recommendation stated "The possibility of the settlement of the B Dump progressing back to the Amaruq Road was discussed in 2022 and concluded to be unlikely as the settlement and tension cracks appear to be limited to within the footprint of the pit. SNC Lavalin was retained by AEM to complete a detailed assessment in order to confirm this conclusion.	The KivIA would like to request to have the opportunity to review the results of the SNC Lavalin assessment when they become available. In particular, prior to the 2024 Annual report review.	Agnico Eagle acknowledges KivIA's comment and is currently working with an external consultant (WSP) with a final deliverable expected to be submitted to Agnico Eagle by the end of 2024. As a result of the timing, the main conclusion of the report will be provided as part of the 2024 Annual Report. Agnico Eagle would like to mention there has been an error in the reference document mentioned, this should have read WSP instead of SNC-Lavalin as the selected consultant.	Section 8.5.7.1.5 of the 2024 Meadowbank Complex Annual Report