

## **Appendix 4**

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### **NIRB 2023 Annual Report Commitments**

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Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2024 Annual Report Section
GN	Comparison of Road and Viewshed Surveys for Caribou	Term and Condition: 29 (Project Certificate No. 008, Amendment No. 1) Agnico Eagle Mines Limited – Meadowbank Division. Meadowbank Division Terrestrial Ecosystem Management Plan, Version 7. (June 2019). Agnico Eagle Mines Limited. Appendix 39, Parts 1–5, Agnico Eagle Mines Limited – Meadowbank Complex 2023 Wildlife Monitoring Summary Report Annual Report (March 2024).	<p>Identification of issue: Section 17.3 of Appendix 39 presents a comparison of road and viewshed surveys for caribou concluding that the former were more likely to detect caribou and result in road closure mitigation. However, in comparing the effectiveness of these two methods for detecting caribou near the Project, the analysis does not account for differences in effort (i.e., time spent looking for caribou and number of observers).</p> <p>Importance to review and supporting rationale: Section 17.3 Road and Viewshed Survey Comparison of Appendix 39 presents a comparison of road and viewshed surveys for caribou. AEM's conclusions of this comparison are: Overall, road surveys were conducted more frequently, were more likely to detect caribou, and were more likely to result in road closure mitigation, despite the lower average detection distance compared to viewshed surveys. It's possible that even if viewshed surveys have a further average detection distance that this does not necessarily mean that viewshed surveys have a higher probability of detection compared to road surveys. Road surveys have greater spatial coverage and had a higher percentage of surveys with caribou detections compared to viewshed surveys. (Page 17-18; AEM, 2024)</p> <p>However, the analysis presented in the report does not account for differences in survey length between the two methods (i.e., the amount of time spent looking for caribou or the number of observers). The methodology for viewshed surveys involves observers spending 10 minutes looking for wildlife at each viewpoint (Page 7-11, AEM, 2024). The length of road surveys is not specifically detailed in the report. However, Appendix 39 states that the survey vehicles move at a maximum speed of 30 km per hour (Page 3-1; AEM, 2024) and that the Whale Tail Haul Road (WTHR) is 64 km long (Page 1-3; AEM, 2024). Furthermore, the number of observers is for either survey type (i.e., road or viewshed) does not appear to be incorporated in the analysis presented in section 17.3 of Appendix 39.</p>	<p>Recommendation 3: The GN recommends the following regarding the above concerns:</p> <p>1. In this and future reports, AEM should provide an analysis of the road and viewshed survey comparison that adjusts for length of survey and number of observers, with an explicit consideration of survey effort.</p>	<p>The purpose of the comparison is to determine whether viewshed surveys are detecting caribou further as an early warning of the approach of caribou and more importantly, are useful in triggering mitigation. Viewshed surveys are designed to occur at locations of maximum viewable area. Observers spend 10 minutes searching for caribou but also record caribou incidentally while traveling between viewshed sites. Road surveys include monitoring while driving so any unique location along Mine roads is monitored for a few minutes given vehicle speed. Agnico Eagle believes that the differences in spatial coverage and observer effort are negligible given the differences in objectives between the two survey types. The biggest difference between the monitoring methods is that they are not designed to overlap in time (i.e., occur continuously throughout year), which is an artifact of their objectives (detecting caribou before they are near the Mine roads versus monitoring caribou near the Mine roads to trigger mitigation).</p> <p>Triggering of mitigation from viewshed surveys is rare and Agnico Eagle does not believe viewshed surveys are effective or add value relative to collar information and road surveys. Agnico Eagle will continue to evaluate the usefulness of viewshed surveys with the TAG and adaptively manage this monitoring.</p>	TEMP V9 in Appendix 38 and Section 17.3 of the Wildlife Monitoring Summary Report in Appendix 39 of the 2024 Meadowbank Complex Annual Report
GN	Helicopter Traffic Monitoring and Reporting	<p>Term and Condition: 61 and 62(f) (Project Certificate No. 004, Amendment No. 002). 28 (Project Certificate No. 008, Amendment No. 001). Agnico Eagle Mines Limited. Appendix 2, Whale Tail Update on Implementation of Commitments (March 2024). Agnico Eagle Mines Limited. Appendix 39, Parts 1-5, Agnico Eagle Mines Limited - Meadowbank Complex 2023 Wildlife Monitoring Summary Report Annual Report (March 2024). Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mines Limited's Meadowbank Gold Mine Project and Whale Tail Pit Project 2019 Annual Report (June 2020). Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mine's Meadowbank and Whale Tail Project 2020 Annual Report (June 2021). Government of Nunavut. Government of Nunavut Comments on Agnico Eagle Mine's Meadowbank and Whale Tail Project 2021 Annual Report (June 2022). Government of Nunavut. Government of Nunavut Comments on Agnico Eagle's Meadowbank Complex 2022 Annual Report (June 2023). Nunavut Impact Review Board. Project Certificate No. 004, Amendment No. 002 (August 2016). Nunavut Impact Review Board. Project Certificate No. 008 (March 2018). Nunavut Impact Review Board. Project Certificate No. 008, Amendment No. 001 (February 2020). Nunavut Impact Review Board. 2019-2020 Annual Monitoring Report Meadowbank Gold Mine and Whale Tail Pit Projects. Agnico Eagle Mines Limited NIBR File Nos. 03AM1107 &amp; 15AM1056 (December 2020). Nunavut Impact Review Board. Exhibit No: 21 Agnico Eagle Terrestrial Environment Commitments. Public Hearing for Whale Tail Pit and Haul Road - Meadowbank Gold Project (September 2017).</p>	<p>Identification of issue: Aircraft activity, including helicopter flights, are recognized as a potential source of disturbance for a variety of wildlife. Appendix 39 illustrates improvements in the Proponent's helicopter reporting, which address many of the comments made by the GN in previous years (GN, 2020-2023). Despite these efforts, the GN maintains concerns regarding the potential impacts of flights operating below prescribed minimum altitudes (e.g., as detailed in Section 4.5.9 of Appendix 39). The GN requests that the Proponent provides additional justification for definitions concerning short-range and long-range flights, justification (as required by relevant laws and regulations where applicable) for the use of low-level flights for certain project activities (e.g., slinging) and ensure pilots provide an explanation for each low-level flight.</p> <p>Importance to review and supporting rationale: During the NIBR's review of the Whale Tail Pit and Haul Road Project, the Proponent made the following commitments to the GN concerning helicopter traffic and monitoring:</p> <p>26. Helicopter – Distance buffers for caribou The Proponent shall apply mandatory, minimum distance buffers of 300m vertically and 1000m horizontally for the operational of all helicopters and fixed winged aircraft in proximity to caribou, subject to exception for safety considerations or the fulfillment of regulatory compliance activities only.</p> <p>27. Helicopter – Distance buffers for landing and take offs The Proponent shall apply the mandatory, minimum distance buffers to landings and take-offs of helicopters, such that engine starts and takeoffs are suspended when caribou are observed within the buffer distance.</p> <p>28. Helicopter – Monitor traffic 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. (NIBR, 2017)</p> <p>Concerning the above, Term and Condition 28 of Project Certificate No. 008 of the Whale Tail Pit Project 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... (NIBR, 2018)</p> <p>In its review of the Project's annual report for 2019, the GN expressed concerns that the TEMP, despite the production of various drafts, had not been revised to include a helicopter monitoring program and that helicopter traffic was not being recorded in annual reports by the Proponent (GN, 2020). In December 2020, the NIBR directed the Proponent to work with the GN and the Terrestrial Advisory Group (TAG) as per Term and Condition 27 and 28 of the Project Certificate No. 008 to revise its TEMP (NIBR, 2020). The GN notes that in annual reports from 2020-2023, the Proponent has provided some of the information requested in the above commitments and the GN's past annual report comments concerning helicopter traffic (GN, 2020-2023). However, as indicated Appendix 2 – Whale Tail Update on Implementation of Commitments, the TEMP update is ongoing, and the Proponent has plans to submit this document in 2024 (Page 5).</p> <p>Despite the absence of an updated TEMP which clearly outlines helicopter monitoring and reporting, the Proponent summarizes the specific flight restrictions pertaining to helicopters used in Project operations and activities in Section 4.5.9 of Appendix 39:</p> <ul style="list-style-type: none"> <li>- Long-range flights are a minimum of 650 m above ground level, except for take-off and landings.</li> <li>- Short-range flights are a minimum of 300 m above ground level, except for take-off and landings.</li> <li>- Notification of caribou, muskox or other wildlife sightings within 1 km of the helicopter pad.</li> <li>- Caribou groups of 50 or more animals, and muskoxen of 10 or more animals must be avoided by a minimum of 1,000 m vertically and 1,500 m horizontally. Flocks of migratory birds must be avoided by 1,100 m vertically and 1,500 m horizontally. Flying over known raptor nests will be avoided.</li> <li>- Harassing wildlife (flying below 300 m) is expressly forbidden unless animals pose an immediate danger to humans. (Page 82)</li> </ul> <p>Definition for Long-range and Short-range Flights In the GN's previous annual report comment for the Project (GN, 2023), the GN noted that definitions for long-range or short-range flights were absent in the Project's 2022 reporting materials. As a result, the GN recommended that the Project's TAG should be engaged to develop the definition for long-range and short-range flights. Additionally, the GN recommended that short-range flights be defined as flights of 5 km or less (GN, 2023).</p> <p>In Appendix 39, the Proponent has provided a definition for long-range and short-range flights, stating that: ... flights were classified as short- or long range by calculating the maximum distance spanned during an individual flight leg... If this distance was &lt;25 km, the flight was classified as short-range. Flights with longer flight spans were classified as long range... (Page 83)</p> <p>As demonstrated above, the Proponent's implemented definition for short-range flights is significantly different from the GN's recommended definition. As such, the GN requests justification for the Proponent's use of &lt;25 km as a threshold to define short-range flights. Additionally, the GN requests clarity on when the TAG was engaged to determine these definitions.</p> <p>Justification for Flights below Mandatory Minimum Altitudes Appendix 39 provides limited justification for flights occurring below the mandatory minimum altitudes: ...certain activities are required to be completed at lower altitudes than specified in the air traffic management plan. External load operations (equipment/material slinging), site inspections, reconnaissance and environmental surveys often require lower flight. Flights with these purposes have been considered permissible for low flight. Similarly, flights lower than 300 m have been considered permissible when flying low due to low visibility (poor weather conditions) or for emergency medevac services... (Page 82)</p> <p>Generally, more justification for flying below mandatory minimum altitudes is required. In reporting helicopter traffic, AEM should distinguish between flights where low-level flying is required by law, regulations, safety, or the performance of environmental monitoring required under the Project Certificate versus flights where low level flying was the preferred means of flying (but not required by statute, regulation, or Project Certificate). For example, the Proponent characterizes external load operations (equipment/material slinging) as permissible for low-altitude flights. However, the Proponent does not reference specific law or regulations that illustrate the requirement for low-altitude flights with external loads.</p> <p>Furthermore, the GN notes that some justification included in the annual flight records fails to provide sufficient context or clarity to the reader. For example, one flight leg (Flight Report Number 600303) states "Road Survey" as the justification for a flight with a mean height above ground of 157.4 m. No further context is provided in the annual flight record tables or in section 4.5.9. Additionally, "Environmental Survey" is used as the comment justification for 15 flight legs that occurred below the minimum height requirement. While it is likely that these environmental surveys correspond to the helicopter surveys conducted under the Arctic Raptor program (this program involved two helicopter surveys; 23-28 May and 09-12 August 2023; Appendix 39, Part 6), reference to the specific environmental program(s) these environmental surveys correspond to is not detailed within these above-mentioned tables or in section 4.5.9. Including this information in future reports would improve transparency for reviewers.</p> <p>In addition to the limited justification for flights occurring below mandatory minimums, the GN is concerned with the occurrence of low flights that do not provide any justification for the purpose of low flights (recorded at the time of the flight). The GN acknowledges that pilots were instructed to begin adding comments to record the reason for low flights beginning on July 28, 2023 (Appendix 39, Part 2; Page 6). However, of the 294 short-range flight legs occurring after this period, 57.1% operated below the minimum height requirement (300 m above ground), without documentation of the purpose of low flight. The mean height above ground for short-range flight legs during this period ranged from 34.1–299.6 m. Additionally, of the 81 long-range flight legs occurring after this period, 58% operated below the minimum height requirement (650 m above ground), without documentation of the purpose of low flight. The mean height above ground for long-range flight legs during this period ranged from 109–454.1m.</p> <p>Missing or Unclear Data The GN identified approximately 29 short-range flight legs (23 for slinging and 6 for Passenger), in the data provided where the Proponent did not provide a value for mean height above ground. Instead, the text "Tall flight too low to distinguish from takeoff/landing" was provided.</p> <p>Additionally, the GN notes that one flight leg (Flight Report Number 3121928) that occurred on April 10, 2023, lists "Wildlife" as both a Flight Code and Flight Type. This flight leg, while not occurring below the minimum height requirement, lists "Environmental Survey" as the justification for a low flight. Based on the materials reviewed, the wildlife survey associated with this flight leg was unclear.</p>	<p>Recommendation 4: The GN recommends the following regarding the above concerns:</p> <p>1. Provide justification for the Proponent's implemented definition for short-range flights as it significantly differs from the GN's recommended definition.</p> <p>2. Provide clarity on how the TAG was engaged to determine the definitions of long-range and short-range flights.</p> <p>3. Ensure that pilots provide justification for all low-level flights at their occurrence so that this information is included in annual report tables (e.g., information in "Comment Justification for Low Flight") to minimize data gaps.</p> <p>4. Cite any relevant laws, regulations or project monitoring requirements for flight legs occurring below minimum flight altitude, with specific attention to external load operations (equipment/material slinging).</p> <p>5. Ensure that numerical data, detailing the mean height above ground, is provided for each flight leg.</p> <p>6. Ensure that any flights that occur for the purpose of environmental surveys are clearly linked to their specific research program.</p>	<p>1. When flight leg data were examined by distance flown, there were very few flights with a distance under 5 km (37 of 656 flight legs; average flight time of 6 mins). This is mostly by design of the site/area and general helicopter use requirements. Meadowbank and Vault are 6.2 km apart, whereas Meadowbank and Whale Tail are 47.8 km apart. When looking at the distribution of flights for analysis, it was clear that 5 km was an unrealistic starting point to distinguish flights within a smaller vicinity versus those that were travelling large distances, largely because these flights averaged 6 minutes including takeoff and landing. Because locations across the site are much further apart than 5 km and less than 5% of flights were under 5 km, a 5 km breakpoint would set unrealistic long-range flight minimums on shorter duration flights.</p> <p>Additionally, many of the flights taking place in a smaller area were slinging flights, which included many trips back and forth between the same two locations. Marking these flights as long distance (because their total distance flown was high) would look counterintuitive on a map and would likely be confusing to a reader. A break point was chosen based on the distribution of flight lengths in a way that was most likely to make logical sense to a reader and provide a starting point for a conversation to define short-range flights later at a TAG meeting. Short-range flights as currently defined allowed the flights to be distinguished between flights that were staying in and around one area of work (e.g. within 25 km of Meadowbank Mine or within 25 km of Whale Tail Mine) but not moving long distances between areas (e.g. from Meadowbank to Whale Tail, from Meadowbank to Meladine, or completing surveys over large areas).</p> <p>2. The priority of TAG discussions over the last year has been on effective caribou mitigation measures, notably, the application of lead caribou monitoring and triggers for migration. Agnico Eagle intends to include discussion of long-range and short-range flights at future TAG meetings.</p> <p>3. Agnico Eagle will continue to work with helicopter contractors and pilots to improve the recording of flight information.</p> <p>4. Aviation regulations are mostly governed by the Canadian Aviation Regulations (CAR), as well as each individual operator's Air Operator Certificate (AOC). The contractor Agnico Eagle retained to operate helicopters around its project require the type of helicopter used to be operated under Visual Flight Rules (VFR) only. The flight requirements for VFR can be found in the Canadian Aviation Regulations under section 602.114 &amp; 602.115. Additionally, practical operational considerations suggest maintaining a lower altitude for several reasons:</p> <p>Complexities of External Load Operations: The dynamics of the load, such as its flight characteristics and the potential for shifting, necessitate the ability to conduct a preemptive emergency landing. Being closer to the ground allows the pilot to land quickly if the load becomes unstable, minimizing the risk of total load loss.</p> <p>Situational Awareness in Low Visibility: Staying closer to the ground helps maintain situational awareness, especially in flat light or whitout conditions. This proximity to the ground provides better vertical reference, which is crucial if the pilot encounters inadvertent Instrument Meteorological Conditions (IMC). In such cases, executing a coordinated 180-degree turn to exit the conditions and regain visual contact with the ground is more feasible when flying at lower altitudes.</p> <p>Performing such maneuvers with an external load is challenging with the instrumentation available in VFR helicopters.</p> <p>As per Nunavut Water Licenses 2AM-MEA-1530 &amp; 2AM-WTP-1830, the Meadowbank Freshet Action Plan and the Whale Tail Freshet Action Plan, Agnico Eagle is responsible for sediment and erosion monitoring and implementation measures. Aerial surveys are used to effectively monitor the entire project (roads and mine sites). During these surveys, periods of low flight altitude are required to monitor water crossings, shoreline erosion, and sediment transportation. These surveys are complementary to other monitoring measures in place.</p> <p>During the Whale Tail NIBR process, the GN disputed claims made by Agnico Eagle regarding Project impact on raptors. The GN stated the current study design did not allow for adequate detection of project related impacts. To resolve this issue, an updated monitoring raptor monitoring program was initiated. Starting in 2021, Agnico Eagle has been conducting broad-scale helicopter surveys, (up to 25km away from the mine-site) to meet the TEMP objective of estimating the Project-related impacts to raptors. The nature of these broad-scale survey requires low-altitude flights.</p> <p>5. Agnico Eagle continues to work with helicopter contractors and pilots to improve the recording of flight information. Additionally, mean height above ground was provided for each flight in Appendix E of the 2023 Wildlife Monitoring Summary Report.</p> <p>6. Agnico Eagle will continue to work with helicopter contractors and pilots to improve recording of flight information. For flights completed during 2023 related to environmental monitoring, links to specific research programs were included in Appendix I of the 2023 Wildlife Monitoring Summary Report. Refer to 1.4.4 for more information.</p>	Section 4.5.9 of the Wildlife Monitoring Summary Report in Appendix 39 of the 2024 Meadowbank Complex Annual Report
GN	Spills Reporting – Coolants	<p>Term and Condition: 26 (Project Certificate No. 004, Amendment No. 001). Agnico Eagle Mines Limited: Meadowbank Complex. Meadowbank Complex 2023 Annual Report 61-000-100-REP-006. (March 2024). Government of Nunavut, Department of Environment, Environmental Protection Division. Environmental Guideline: General Management of Special and Hazardous Waste. (March 2023). <a href="https://www.gov.nu.ca/sites/default/files/publications/2024-05/Hazardous%20Waste%202023-03.pdf">https://www.gov.nu.ca/sites/default/files/publications/2024-05/Hazardous%20Waste%202023-03.pdf</a></p>	<p>Identification of issue: The GN appreciates the Proponent's efforts to include detailed information on all spills in Section 7. Spill Management, of the Meadowbank Complex 2023 Annual Report (Annual Report) (AEM, 2024). However, tables 7-3–7-5 indicated several spills involved an unspecified "coolant" by the Proponent. In the absence of information about the specific type of coolant(s) involved, the GN wishes to note that some coolants, particularly ethylene glycol, can be highly toxic and attractive to wildlife. As such, spills of ethylene glycol can pose a risk to wildlife that come into contact with contaminated soil or water.</p> <p>Importance to review and supporting rationale: Section 7. Spill Management of the Annual Report (AEM, 2024) provides information regarding all reportable spills and non-reportable spills that occurred at the Meadowbank Site and Whale Tail Site in 2023. This section of the Annual Report indicates that 37 reportable spills occurred in 2023 and that these spills were reported to the GN; additionally, this section indicates that 151 non-reportable spills occurred in 2023. Summary details for both spill types (i.e., reportable and non-reportable) are provided in tables 7-2–7-5 of the Annual Report.</p> <p>While the GN appreciates the Proponent's efforts to include detailed information on all spills in annual reports, the GN notes that tables 7-3–7-5 indicated several spills involved and unspecified coolant by the Proponent. In the absence of information about the specific type of coolant(s) involved, the GN wishes to note that some coolants, particularly ethylene glycol, can be highly toxic and attractive to wildlife (GN, 2023).</p>	<p>Recommendation 5: The GN recommends the following regarding the above concerns:</p> <p>1. In this and future annual reports, the Proponent specify the type of coolant(s) involved in Project activities and spills.</p> <p>2. If and where applicable to this Project, the GN recommends using less toxic propylene glycol instead of ethylene glycol.</p>	<p>1. Agnico Eagle acknowledges the GN's comments and will provide more details regarding the specific type of coolant used on site for any reportable spill and/or reportable spill follow up.</p> <p>2. Agnico Eagle acknowledges the GN's comment and will continue to look for alternatives to ethylene glycol. Due to the harsh environmental conditions during winter, the use of ethylene glycol on equipment is a manufacturing requirement to maintain and ensure optimal operating performance and prevent equipment breakdown.</p>	Section 7 of the 2024 Meadowbank Complex Annual Report

Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2024 Annual Report Section
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.	Comment: Culverts crossing fish bearing waters along the AWAR and WTHR requiring repair maintenance. 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.  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."	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.	Agnico Eagle provided to DFO in 2023, a detailed list of all culverts along both roads for that are considered fish bearing.  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.  Obstructed and damaged culverts are listed in the Annual Geotechnical Inspection Report. It will be specified into the 2024 Annual Geotechnical Inspection report 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.	Section 8.5.5 of the 2024 Meadowbank Complex Annual Report
CIRNAC	Closure Planning	2023 Annual Report: Section 9. NIRB Project Certificate No. 004, Amendment No. 003: Term & Condition 78, 79, and 80. NIRB Project Certificate No. 008, Amendment No. 001: Term & Condition 7 and 13	Background/Rationale: Section 9 of the 2023 Annual Report provides high-level discussion related to the closure planning and implementation processes. For example, the section describes the state of the closure planning process, ongoing studies, information gaps, and progressive reclamation. While CIRNAC appreciates receiving this information, the Department has a wide range of questions and comments regarding the closure planning process for the Meadowbank and Whale Tail sites, including issues related to: <ul style="list-style-type: none"> <li>Freeze-back and capping thickness;</li> <li>Progressive reclamation;</li> <li>Results of thermistor measurements for tailings and waste rock storage facilities (WRSF);</li> <li>Meadowbank water treatment requirements;</li> <li>Meadowbank WRSF seepage quality;</li> <li>Meadowbank post-closure in-pit water quality;</li> <li>Meadowbank in-pit tailings covers;</li> <li>Thermal performance of Meadowbank WRSF covers; and</li> <li>Whale Tail Project post-closure water quality.</li> </ul> <p>These questions and comments have been submitted in prior annual report reviews conducted by CIRNAC and are pending resolution, as summarized in Table A. While these questions and comments could be deferred until the submission of formal closure planning documents (e.g., periodic, updated Interim Closure and Reclamation Plans (ICRPs) and security estimates), CIRNAC is of the view that a more active dialogue on closure planning is required. This is particularly important for the Meadowbank and Whale Tail Projects, considering that active closure is currently scheduled to begin by 2026. Taking into consideration that relatively limited time remains before the implementation of closure, additional and regular dialogue between AEM, regulators, and interested parties would be beneficial. This would also help facilitate reaching technically sound closure and reclamation decisions in a timely manner.</p>	CIRNAC recommends that AEM convene an annual workshop with regulators and interested parties to discuss the status of closure planning for the Meadowbank and Whale Tail Mines. The overall goal of the workshop is to ensure that all organizations, including AEM, are fully informed of closure requirements and to proactively identify key issues that need to be resolved on a priority basis. This process will also facilitate the timely design, approval, and implementation of an appropriate closure strategy for the sites.	Agnico Eagle acknowledges that active dialogue on closure planning is justified between the involved organizations and regulators. Agnico Eagle intends to continue providing updates on progressive closure work, closure planning and closure engineering concepts, for both Meadowbank and Whale Tail sites, through the Annual Report and the next version of the Closure and Reclamation Plans.  In the next version of the Closure and Reclamation Plan, a preliminary schedule of workshops with regulators and interested parties will be presented, for the remaining part of operation until the submission of the Final Closure and Reclamation Plan. As per the Water Licenses (ZAM-MEA1530 and ZAM-WTP1830), the Licensee shall submit the Final Closure and Reclamation Plan to the Board for approval at least twelve (12) months prior to the expected end of planned mining.  Agnico Eagle believes that the responses and actions provided in regard to the previous comments from CIRNAC related to closure (Table A) were adequate as per the progress of the closure work and will be further answered as additional information related to closure becomes available from various studies and monitoring data and will be presented as part of the next Closure and Reclamation Plan.	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.  Schedule for workshops will be provided in the Closure and Reclamation Plan
CIRNAC	Water Quality Prediction Methods	2023 Annual Report Appendix 13: Meadowbank Water Management Plan (Version 12). 2023 Annual Report Appendix 14: Whale Tail Water Management Plan (Version 12). CIRNAC Technical Review Comments on the 2022 Annual Report to NIRB. AEM Responses to 2022 Annual Report Review Comments. CIRNAC Technical Review Comments on the Whale Tail Pit Project Expansion Environmental Assessment (Technical Review Comment #3).	Background/Rationale: CIRNAC provided a number of recommendations related to the water quality predictions for the Meadowbank and Whale Tail Projects in its review of the 2022 Annual Report. The specific request was as follows:  "...CIRNAC recommends that AEM, on a priority basis, revisit the water quality modelling assumptions and approaches used for both Meadowbank and Whale Tail to ensure all future project decisions (particularly closure) are informed by sufficiently accurate predictions. At minimum, factors to consider when revisiting the assumptions and approaches should include: 1. using monthly (or smaller) time steps for all model inputs instead of the current one-year time step; 2. performing hydrodynamic modelling of receivers instead of assuming fully mixed conditions; 3. performing sensitivity analyses to accurately capture the range of uncertainty associated with water quality predictions; and 4. expanding efforts to characterize loadings from pit walls."  CIRNAC reviewed AEM's response to the above-noted recommendations and 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: 1. Unresolved – It is CIRNAC's understanding that this recommendation has not been acted on, based on the Department's review of the updated water quality predictions. 2. Unresolved – The updated water quality predictions do not include hydrodynamic modelling of water quality concentrations. Notably, the updated water quality prediction reports include statements such as: "The present mass balance model cannot simulate the treated effluent plume discharged in Kangisluik 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." 3. Partially resolved – The updated water quality predictions include sensitivity analyses to address the implications of dry years. The predictions do not, however, address the uncertainty within a broad range of other model inputs (e.g., contaminant source terms). 4. Partially resolved – The updated water quality predictions have incorporated the most recent monitoring data from pit sumps. However, uncertainty remains with respect to loadings from pit wall seeps.  For clarity, CIRNAC is of the opinion that these unresolved concerns represent substantive deficiencies in AEM's water quality prediction methods. Collectively, there are multiple simplifying assumptions and approaches being used by AEM to predict water quality that warrant reconsideration. While CIRNAC supported using simplifying assumptions and approaches during Project approval and the initial years of operation, the Project is now at a stage that justifies the development of more refined and accurate water quality predictions. In the absence of more refined and accurate predictions, CIRNAC lacks confidence in the conclusions reached by AEM that the project will not result in significant adverse impacts in the future.  To address the unresolved and partially resolved items noted above, the following recommendation reiterates prior requests from CIRNAC. Please refer to CIRNAC #8 in the 2022 Annual Report for additional details on the rationale for the request.	CIRNAC recommends that AEM revisit the water quality modelling assumptions and approaches used for both Meadowbank and Whale Tail to ensure that all future Project decisions, particularly those related to closure, are informed by sufficiently accurate predictions. At a minimum, factors to consider when revisiting the assumptions and approaches include the following: 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.	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.  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 match the FEIS concentrations predictions 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.	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	Local Area Marine Mammal Monitors	NIRB Project Certificate No. 004, Amendment No. 003: Term & Condition 36. NIRB Project Certificate No. 004, Amendment No. 003: Appendix A, Commitment 37. 2023 Annual Report: Sections 11.8.1 and 11.8.2. 2023 Annual Report Appendix 32: Meadowbank and Whale Tail 2023 Marine Mammal and Seabird Report.	Background/Rationale: NIRB Project Certificate No. 004, Amendment No. 003, Term & Condition 36 states:  "Cumberland shall ensure the placement of local area marine mammal monitors onboard all vessels transporting fuel or materials for the Project through Chesterfield Inlet."  Term & Condition 36 is consistent with Commitment No. 37 in Appendix A of the amended Meadowbank Gold Mine Project Certificate.  The 2023 Annual Report does not make reference to the placement of local area marine mammal monitors onboard such vessels throughout the 2023 barge season. Sections 11.8.1 and 11.8.2 of the Annual Report communicates that there was a Marine Mammal and Seabird Observer Program in place. According to Section 11.8.2 and the 2023 Marine Mammal and Seabird Annual Report (Appendix 32), it is understood that AEM is experiencing challenges in recruiting and retaining local area marine mammal monitors. With the involvement of only one local monitor sourced from Baker Lake, AEM must rely on the crew of contracted shipping companies to perform the full scope of the observation work in the Chesterfield Inlet area, necessitated by Term & Condition 36.  If there were no local area marine mammal marine monitors onboard all vessels transporting fuel or materials through Chesterfield Inlet during the Project's 2023 barge season, AEM is in non-compliance with Term & Condition 36 of the amended Meadowbank Gold Mine Project Certificate.	CIRNAC recommends that AEM confirm whether or not it employed local area marine mammal monitors onboard all vessels transporting fuel or materials through Chesterfield Inlet in 2023, pursuant to Term & Condition 36. If it was not successful in doing so, a description of efforts that will be performed in 2024 to address this issue should be provided.	In 2023, Agnico Eagle had local wildlife observers for a total of 27 days surveyed in July, August and October. The intent is to always have one local monitor on transiting vessel, and they overlap on schedule between 10 to 14 days. Due to delays encountered in the arrival of the vessels deserving the Meadowbank Complex, outside of Agnico Eagle's control, the first monitor from Chesterfield Inlet was on stand-by at the mine site and was finally not able to board the vessel, nor was he able to perform any observations. The second local monitor from Chesterfield Inlet had to cancel his duty for personal reason the day before heading to Baker Lake to board the shipping vessel. In order to comply with Condition 36, Agnico Eagle was able to hire a local monitor from the Baker Lake community that boarded the vessel for a first observation period of 13 days (July-August) and then return on the vessel for an additional 2 days (August) with early departure due to personal medical conditions. The same local monitor then boarded again the transiting vessel in October for a total of 13 days of observations. If there is delay in the vessel arrival in Baker Lake or if the local monitor decides to not do the work anymore, the flexibility to hire someone else on a short notice is largely reduced, especially if flight and accommodation in Baker Lake are needed. For 2024, it is Agnico Eagle's intent to continue to hire local monitors in compliance with Term and Condition 36.  Agnico Eagle confirms it hired three (3) local area mammal monitors in 2023 with two (2) being able to board vessels and two (2) to date have been hired in 2024. Agnico Eagle also would like to highlight that one of the persons hired in 2023 was rehired in 2024 ensuring knowledge and skills development for this individual and further consistencies within the program. Furthermore, should no local monitor be able to board the vessel for any reason, all shipping companies contracted by Agnico Eagle have received the training to perform the marine mammal monitoring requirements, and would be able to perform the monitoring.	2024 MMSO Report in Appendix 32 of the 2024 Meadowbank Complex Annual Report
CIRNAC	Community Information Meetings in Chesterfield Inlet	NIRB Project Certificate No. 004, Amendment No. 003: Term & Condition 39 and 40. NIRB Project Certificate No. 004, Amendment No. 003: Appendix A, Commitment 42 and 105. 2023 Annual Report: Section 11.9.1.	NIRB Project Certificate No. 004, Amendment No. 003, Term & Condition 39 states: "...Cumberland shall annually advertise and hold a community information meeting in Chesterfield Inlet to report on the Project and to hear from Chesterfield Inlet residents and respond to concerns. A consultation report shall be submitted to NIRB's Monitoring Officer within one month of the meeting." This Term & Condition is consistent with Commitment No. 42 in Appendix A of the Project Certificate.  Furthermore, pursuant to Term & Condition 40 of the Project Certificate: "Cumberland shall gather Traditional Knowledge from the local HTOs and conduct a minimum of a one-day workshop with residents of Chesterfield Inlet to more fully gather Traditional Knowledge about the marine mammals, cabins, hunting, and other local activities in the Inlet. Cumberland shall report to the Kivalliq Inuit Association and NIRB's Monitoring Officer annually on the Traditional Knowledge gathered including any operational changes that resulted from concerns shared at the workshop."  This Term & Condition is consistent with Commitment 105 in Appendix A of the Project Certificate.  Section 11.9.1 of the 2023 Annual Report notes that the company was unable to visit Chesterfield Inlet and meet with community members in 2023 to satisfy the requirements of Project Certificate Term & Condition 39 and 40. Attempts to visit the community were unsuccessful due to unfavorable weather and limited availability of accommodations within the community due to competing demands from the construction industry. The company committed to proactively holding a community visit in Chesterfield Inlet in early 2024 before the recommencement of local construction projects.	CIRNAC recommends that AEM: a) Consider alternate means of interacting with Chesterfield Inlet community representatives when it is unable to hold in-person information meetings and Traditional Knowledge workshops (e.g., video or telephone conference meetings can facilitate communication when in-person attendance is not possible or to supplement such interactions); and  b) Provide an update on the completion status of in-person information meetings and Traditional Knowledge workshops in 2024.	a) Agnico Eagle has taken action on alternative means of interacting with the Chesterfield Inlet community representatives. For example, Agnico Eagle have held teleconference calls, phone sessions, and mandated the local Community Liaison Officer to hold engagement and/or information sessions. The Public Affairs department also planned visits earlier in the year to avoid the community's busy construction season.  b) Engagement activities, including information sessions and workshop, for 2024 will be available in the 2024 annual report.	Section 11.9.1 of the 2024 Meadowbank Complex Annual Report
CIRNAC	Consideration for Inuit Qaujimajatuqangit Contributed by Knowledge Holders in Terrestrial Ecosystem Management Plan Monitoring Results	NIRB Project Certificate No. 008, Amendment No. 00: Term & Condition 28. 2023 Annual Report: Section 8.18 and 8.18.2.	The reporting requirements for Term & Condition 28 state: "The Proponent shall submit a revised [Terrestrial Ecosystem Management Plan] TEMP to the Nunavut Impact Review Board (NIRB) within one (1) year of issuance of the Project Certificate, with subsequent versions provided as appropriate. Results of the TEMP shall be reported to the NIRB annually, including details of how Inuit Qaujimajatuqangit contributed by knowledge holders has been considered and utilized in associated activities and updates."  Section 8.18 and 8.18.2 of the 2023 Annual Report provide updates on the status of the TEMP and the Terrestrial Advisory Group (TAG) activities. While information is provided on the management plan's revision status and TAG meeting outcomes, no details were provided on how Inuit Qaujimajatuqangit, contributed by local knowledge holders, has been considered and utilized within TEMP activities and plan updates.	CIRNAC recommends that AEM provide details as to how Inuit Qaujimajatuqangit, contributed by local knowledge holders, has been considered and utilized in TEMP activities and plan updates. This would ensure compliance with the reporting requirements of Term & Condition 28 of the amended Whale Tail Project Certificate.	A draft update to the TEMP is under review with the TAG and includes two recent examples of how Agnico Eagle incorporates Inuit Qaujimajatuqangit (IQ). One example includes consensus decision making with IQ holders and elders (in addition to KIVA, BLHTO and GN) about the application of mitigation levels. Another includes the use of a lead caribou approach to trigger road mitigation during spring migration. The lead caribou approach is based on IQ and the traditional Inuit practice of letting lead caribou pass, was shared during TAG meetings and the IQ coordinator. Agnico Eagle completed the first iteration of a pilot program on lead caribou protection during the spring migration in 2024.	TEMP V9 in Appendix 38 and Section 1.6 of the Wildlife Monitoring Summary Report in Appendix 39 of the 2024 Meadowbank Complex Annual Report

Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2024 Annual Report Section
CIRNAC	Cross-cultural Awareness	NIRB Project Certificate No. 008, Amendment No. 001: Term & Condition 59, 2023 Annual Report: Section 11.10.3.2.3.2; AEM's response to the NIRB's 2022-2023 Annual Monitoring Report for the Meadowbank Gold Project and Whale Tail Pit Project with Board Recommendations.	NIRB Project Certificate No. 008, Amendment No. 001, Term & Condition 59 states: "The Proponent is encouraged to work with the Kivalliq Inuit Association to establish cross-cultural training initiatives, which promote respect and consideration for the importance of Inuit Qaujimajatuqangit to the Inuit identity and to make this training available to Project employees and on-site sub-contractors."  CIRNAC appreciates that section 11.10.3.2.3.2 of the 2023 Annual Report notes that, in 2022, the company decided to put this form of training on hold while it was being redeveloped to better achieve its intent. This was deemed necessary to ensure its continued relevance and effectiveness for enhancing cultural awareness. It was noted that no workshops were delivered at the Meadowbank Complex in 2023, but plans were made to deliver a new cross-cultural training program in 2024. Updates on the delivery of cross-cultural training initiatives in future annual reports will be required in order to determine AEM's compliance with this Term & Condition.	CIRNAC requests that in 2024, AEM provide an update on its plans to deliver cross-cultural training initiatives. This update can assist CIRNAC and other interested parties in determining whether necessary actions are being taken to implement the requirements of Term & Condition 59.	Agnico Eagle wishes to highlight the significant progress made in 2023 on the Cross-Cultural training program revamp, with support of Agqiumavvik – a recognized local organization based in Arviat. Building upon the insights gained from the previous year's evaluation, the training program underwent a comprehensive overhaul to better align with Agnico Eagle's core values and to foster a deeper understanding of local culture.  One notable enhancement to the program was the inclusion of Inuit perspectives and voices. Recognizing the importance of authentic representation and cultural sensitivity, efforts were made to have Inuit facilitators lead the workshops.  The training has been rebranded as Cultural Awareness. For the first half of 2024, Meadowbank Complex delivered over 125 hours of the new Cultural Awareness training to its employees. In total, more than 40 people at Meadowbank Complex received this specific training.	Section 11.10.3.2.3.2 of the 2024 Meadowbank Complex Annual Report
CIRNAC	Pre-employment Orientation for Potential Hires	NIRB Project Certificate No. 004, Amendment No. 003: Appendix A, Commitment 102, 2023 Annual Report: Appendix 1.	Pursuant to Commitment 102 in Appendix A of the amended Meadowbank Project Certificate, AEM is: "...to include pre-employment orientation for potential hires by Cumberland in the Labour Force Development Plan that will be developed under the terms of the IIBA. This commitment is in recognition that it is in the interest of both potential hires and Cumberland to ensure to the extent practicable that potential hires are well informed of the implications (nature of work, workforce management, personal and family challenges etc.) of accepting employment with Cumberland."  According to the commitment update in Appendix 1 of the 2023 Annual Report, this commitment has been completed and is included in Term & Condition 63 of the Amended Meadowbank Gold Mine Project Certificate. This Term and Condition concerns the formation of the Meadowbank Gold Mine Socio-Economic Monitoring Committee, which has since transformed into the Kivalliq Regional Socio-Economic Monitoring Committee and is supported by AEM's Kivalliq Socio-Economic Working Group. Upon further review of the 2023 Annual Report and the Kivalliq Projects 2023 Socio-Economic Monitoring Program Report (Appendix 47), no information can be found that provides an update on Commitment 102. It is important for potential hires to receive adequate pre-employment orientation to maximize their likelihood of succeeding in their careers with AEM.	CIRNAC requests that AEM provide an update on its implementation of Commitment 102 from Appendix A of the amended Meadowbank Project Certificate. This commitment concerns the provision of pre-employment orientation for potential hires as part of its Labour Force Development Plan, required under the terms of its IIBA.	In 2023, five (5) Pre-employment Training programs were delivered with a total of 45 participants completing the training programs. Training programs are fully facilitated by Ilitaqiniq. Programs were delivered in the following communities: Arviat (2 sessions), Rankin Inlet (2 sessions) and Baker Lake (1 session). One (1) additional session was scheduled for Chesterfield Inlet, but it was cancelled due to a lack of accommodation in the community.	Section 11.10.3.2.1 of the 2024 Meadowbank Complex Annual Report
KivIA	Uncertainty about caribou responses to road closures and convoys	Annual Report 5, 8.18.1.8; p. 346, Appendix 39 Part 6, Appendix K	Gap/Issue: Effectiveness of conveying in relation to caribou disturbance is not proven from the analysis of caribou behavioural monitoring.  Disagreement with the Annual Report conclusion: The statement in the Executive Summary (Appendix 39, Part 6, Appendix K) that "Findings from these analyses suggest that the use of convoys to consolidate multiple essential vehicles into a single disturbance event is an effective mitigation measure for reducing disturbance to caribou." is not explicitly supported by the analyses.  Reasons for disagreement with the Annual Report conclusion: The KivIA appreciates that Agnico Eagle undertakes extensive road closures in 2023 (80 days AWAR and 33 WTHR 24 h closures (App. 39, Part 1, 5.3.6.6.), but the KivIA remains concerned about what we know about caribou behavior during the road closures.  We know that, overall, when most caribou encountered a road, the road was closed but this depended on caribou numbers (Appendix 39, Part 1, Table 3.13). When caribou numbers were lower, from only half to three-quarters of the caribou encountered a closed road (AWAR 90.5% +/-5.6 and WTHR 74 %/+/- 10.4 SE from Table 3.13). During the behavior monitoring, about half the bouts included a disturbance and whether the road was closed or not did not statistically affect caribou behavior. Even when the road is closed, there are convoys and other traffic.  The KivIA's concern is that Agnico Eagle did not analyse responses to conveying relative to being effective mitigation. Two issues are that firstly, there are no criteria to establish what constitutes and defines 'effective' mitigation and, secondly, there is no description of the duration of the caribou's exposure to the length of the convoy (number of vehicles and their spacing distance) and the caribou's response.  In raising this issue, the KivIA is at pains to point out that the behavioral monitoring and analyses are informative about how caribou groups respond to disturbances along the roads. The statistical analyses are clearly explained and could be a basis for follow-up analyses for adaptive mitigation and measuring mitigation effectiveness. The analyses acknowledge caution in interpreting the analyses as the high number of variables and individual variability in behavior (Appendix 39, Part 6, Appendix K, p.36). The KivIA recognizes that sample size may be a limitation to further analysis and thus to increase statistical power, grouping bedding and foraging into undisturbed and alert, walking and trotting into disturbed categories may help. Foraging and bedding are related to each other as caribou both ruminate and nap when bedded and ruminating is essential before caribou can start foraging.  Elsewhere in the Annual Report, the daily convoys for 2023 are tabled by date with number of vehicles: based on App. 39, Table 3.16, we can see that the convoys were between 2 and 11 vehicles, up to three times a day and irregular being 118 convoys (644 vehicles) over 127-day period of road closure. It is not reported whether there was other traffic on the days without convoys or how long a convoy took to pass a group of caribou. The duration of a convoy is important because the duration of behavior responses increased with the frequency of disturbances and it is uncertain whether the caribou would perceive a convoy as a single or multiple disturbance (App. 39; Part 6, App. K, p. 35; Part 7, App. 8).  The behavior monitoring methods mentions 'multiple' convoys and 90min bouts of monitoring behavior before, during and after convoys (p.10) but the responses to the convoys were not separate from other disturbances in the analyses. However, Agnico did note that although road closure status did not significantly predict response behaviour, the frequency of walking increased during road closures possibly as a result of the convoys (App. K, Table 6.4-1).	The KivIA requests an analysis of 2023 caribou behavioral responses to convoys including convoy duration and number of daily disturbances.	Agnico Eagle appreciates this comment and associated recommendation relating to the caribou behaviour monitoring program. As a new analysis for the 2023 reporting year, Agnico Eagle included statistical investigation of the time to return to baseline (pre-disturbance) behaviours for surveys where one, two or three, and greater than three survey intervals recorded a disturbance event. Across all surveys (including those conducted during convoys) the mean number of three-minute intervals where a disturbance was recorded was 2.1, with the median being one interval, and the maximum being nine intervals. The results show that when fewer survey intervals include a disturbance event, caribou return to baseline behaviours more quickly. As such, convoys serving to concentrate multiple vehicles within the shortest possible period are likely to reduce the time for caribou to return to baseline, and thus effectively reduce overall disturbance to caribou. Agnico Eagle does agree that information on the duration of exposure to each convoy is a useful metric, alongside the number of vehicles in each convoy.  Moving forward, Agnico Eagle will endeavour to collect this information for convoys wherever possible and conduct an analysis including convoy duration and number of vehicles within convoys. Specifically, this would mean adding new data recording for: a) the number of vehicles in the convoy, b) the time required for a convoy to pass a particular location/caribou, and c) the time when the last vehicle passed. For the 2024 annual reporting period, this information is likely to only be available starting in the fall of 2024.	Caribou Behaviour Study Report (appendix of the 2024 Wildlife Monitoring Summary Report) in Appendix 39 of the 2024 Meadowbank Complex Annual Report
KivIA	Annual Report - Appendix 39 organization	Appendix 39	Gap/Issue: The issue is the difficulty of navigating through the Annual Report Appendix 39 (Meadowbank and Whale Tail 2023 Wildlife Monitoring Summary Report).  Disagreement with the Annual Report conclusion: The layout (structure) of Appendix 39 is the apparently random splitting into seven separate pdfs (parts) which hinders any reviews.  Reasons for disagreement with the Annual Report conclusion: The split into the seven parts are in the middle of sections, or part way through a table - that's one hindrance to reviewing, page numbers are not consecutive between sections and the List of Contents does not cross-reference how Appendix 39 was divided into seven separate files to mitigate individual file size.	KivIA requests Agnico Eagle improve flow and readability for the 2023 Annual Wildlife Report, and other split reports for future review. Lists of Contents (in Part 1) should have cross-references to the individual parts, and tables (such as Table A.1 – 113 pages) should be grouped together rather than interrupting the flow of the monitoring results.	Agnico Eagle acknowledges KivIA's comment and will work to improve flow and readability in future split documents. Agnico Eagle would like to remind that the full version and the split documents are both available and shared with all the regulators via OneDrive. More access can be provided on request.	Wildlife Monitoring Summary Report in Appendix 39 (split version) 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's been an error in the mentioned referenced document, we 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
ECCC	Contaminant loading – Meadowbank site	Meadowbank Complex – 2023 Annual Report	Table 4-13 summarizes the key differences between the predicted and the measured water quality data at the Third Portage Open Pit Sump (i.e. Portage Pit E), Goose Island Open Pit Sump (i.e. Goose Pit), North Portage Pit Sumps, Vault Pit Sumps and Phaser Pit Sumps, and is followed by comparison figures which illustrate these differences. Page 82 of the annual report indicates that, based on this analysis, many of the predicted values for water quality and quantity for the Probable and Probable Poor End scenarios and Annual Average and 25% Percentile Water Quality Forecast have differences greater than +/- 20% when compared to the measured values. This section identifies several potential causes that could contribute to these differences, including the following potential causes of higher contaminant loading: • Higher contaminant loads observed in Portage Pit could be the result from additional transfer of reclaim water from the Central Dike Downstream Pond. • Higher contaminant loads of arsenic and nickel could also be the results of processing ore from Whale Tail Pit. This ore was shown to leach out higher concentration for certain metals, such as arsenic. • Since 2019, in-pit deposition activities in Goose and Portage Pit contribute the main contaminant loading to the pit water. • For North Portage Pit, the higher load could originate from water transfer from South Cell TSF, Downstream Pond and Goose Pit and transfer from Third Portage Pit. • Higher observed load in the seepages flowing into the pits also contribute in part to the contaminant loads observed in Goose and Portage Pits. • The contaminant loads measured in Vault and Phaser Pits water were generally higher than the prediction. However, there has been a continued improvement in pit water quality year after year since the end of mining at Vault and natural re-flooding was allowed to take place in the pits.  Clarification should be provided whether this information is used to inform water quality modelling for the project.	Describe how the potential causes of higher contaminant loading identified on page 82 of the 2023 annual report are incorporated into the ongoing updates to the Meadowbank water quality predictions.	It is important to note that the water quality forecasted in the FEIS was based on a set of hypotheses used to develop the Life of Mine at that time. The WQF model is adapted annually to consider actual site conditions, site constraints, water volume transfers and characteristics of the tailings to manage in order to produce a reliable forecast.  More specifically, the water quality forecast model is updated annually based on the following information from the site: •All the different volumes of water transferred between different ponds on the site, including the transfer of reclaim water. •Water quality data sampled each year for the different source terms reporting to the site.  Using this information, the water quality forecast (WQF) model is updated to consider the different water transfers that occurred on the site. The water quality for each source term is also updated based on the field measurements.  A preliminary water quality forecast for each contaminant of concern is then generated and compared to the measured values. If the forecasted trend does not follow or match the trend observed based on the field measurement, it indicates that the load considered in the model is either too low or too high. To rectify this, the main source term load reporting to the different ponds and pit lakes (i.e. surface runoff, seepages and mill effluent) on the site is adjusted so that the forecasted trend follows the measured concentration. Thus, any higher loads that are observed in the ponds or pit lakes are captured in the annual update of the WQF model. For the remaining years of the Life of Mine, the source term load for each contaminant is maintained at the same concentration as the value selected for 2023. However, the source term load for each contaminant of concern considered in the model will be re-evaluated and adapted annually based on the field measurements.	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
ECCC	pH of Portage and Goose pit water	Meadowbank Complex – 2023 Annual Report	Page 82 of the annual report identifies several potential causes that could contribute to differences between the predicted and the measured water quality data at the Third Portage Open Pit Sump (i.e. Portage Pit E), Goose Island Open Pit Sump (i.e. Goose Pit), North Portage Pit Sumps, Vault Pit Sumps and Phaser Pit Sumps, including the following: • The pH measured in Portage and Goose Pits is generally higher than the predicted values. A possible cause for this phenomenon is that the groundwater infiltrating into the pits have a higher alkalinity concentration and pH when compared against the background water quality of the surrounding Third Portage Lake. • Un-ionized ammonia concentration in water is greatly influenced by the pH. The higher the pH, the higher the fraction of un-ionized ammonia in the water. The predicted pH of the Portage and Goose pit water is between 6.1 and 6.3, while the measured values are generally between 7.7 and 8.4.  Additional information should be provided to support a better understanding of how the higher-than-expected pH affects the project, including both current and future water quality. pH is a known toxicity modifying factor and may influence the availability of other constituents.	With respect to the measured pH of Portage and Goose pit water exceeding the predicted pH, ECCC recommends that the following information be provided: (i) Discuss the implications over the life-of-mine if pH continues to exceed predictions; (ii) Describe potential effects the higher-than-expected pH has on water quality (site and receiving environment) and the aquatic environment; and (iii) Discuss adaptive management options and whether updates to the site water quality model are required.	The higher pH observed in the pit lakes result from the loading from the mill effluent which is alkaline in nature. The mill effluent pH is raised as part of the cyanide destruction process prior to discharge to the pit lakes.  Under the current plan, during the Life of Mine, it is important to note that no contact water is discharged to the environment from the Portage and Goose Pit. At closure, the contact water stored in the pit lakes will be treated, if necessary, prior to discharge. The selected water treatment process will be designed to include a final pH adjustment step. This step will ensure that the pH in the final effluent is close to neutral so that any residual ammonia (NH4+) instead of un-ionized ammonia (NH3). The potential effects of un-ionized ammonia in the treated effluent to the receiving environment and the aquatic environment will thus be limited and controlled. Note that a new water management strategy may be proposed in the near future as water treatment studies progress.  The main adaptive management options that will be used to control the pH of the final effluent is with an active water treatment where the pH can be adjusted. During the operation of the water treatment plant at closure, the pH will be monitored continuously using a pH sensor. If a non-compliance situation is detected, the treated water shall be discharged back to the pit lake instead of the receiving environment.  As described in Section 5.1, the source terms considered in the WQF model are updated annually so that the forecasted trends follow the observed field measurements.	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
ECCC	Environmental Emergencies regulated commodities	240330-03MNI07-2023 Annual Report-IA1E; Section 7.1 Spill Summary, p.119, 231003-03MNI07.16MND56-Site Visit Report-OT66; Photo 48, p.42, 240330-03MNI07-Appendix 22-IA2E; Table 6 - Materials stored at site during operations, p.34-36 and appendix P - Environmental Emergency Regulation Plan Cross Reference Table, p.214	The Proponent acknowledges that certain commodities stored on-site are subject to the Environmental Emergencies (E2) Regulations or may be. However, given the various containment methods used throughout the project and potential eligibility for exclusions outlined in the E2 Regulations, it remains unclear which commodities are currently captured under these regulations.  The Nunavut Impact Review Board Site Visit Report, dated October 2023, states that a new fuel tank was constructed in 2023 in the title of Photo 48. ECCC would like to bring to the attention of the Proponent that a notice of change may be required as stipulated in subsection 3(5) of the Environmental Emergency (E2) Regulations, 2019: "(5) A responsible person must, within 60 days after the day on which any of the following situations occurs, submit an updated notice to the Minister that contains the information referred to in Schedule 2: (a) the information that was reported under section 1 or 2 of Schedule 2 has changed; (b) the maximum expected quantity that was most recently reported under paragraph 3(d) of Schedule 2 in respect of a substance has increased by 10% or more; or (c) the maximum capacity that was most recently reported under paragraph 3(f) of Schedule 2 in respect of a container system, in which a quantity of a substance is contained, has increased by 10% or more."	ECCC recommends adding a table in the Spill Contingency Plan (SPC) summarizing the commodities subject to the E2 Regulations. This will ensure that the Proponent is fully aware of its responsibilities under the E2 Regulations.  Additionally, an updated notice should be submitted if a situation covered under subsection 3(5) of the E2 Regulations occurs.	Agnico Eagle thanks ECCC for their comments. Updated notices under the E2 SWIM platform have been submitted to account for the new tank at Meadowbank. Agnico Eagle will continue to submit notice under the E2 SWIM platform as situation detailed in subsection 3(5) of the Environmental Emergency (E2) Regulations happen. Agnico Eagle will provide a table summarizing the E2 commodities subject to the E2 regulation in the next update of the Spill Contingency Plan.	Spill Contingency Plan Section 3.1 in Appendix 22 of the 2024 Meadowbank Complex Annual Report



Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2024 Annual Report Section
ECCC	Toxic gas release event	240330-03MN107 16MN056-Appendix 46-IA1E, Section 7.9 Toxic gas releases, p.40-41	The Proponent fails to specify the types of toxic gases that could be released in such an event. Given the presence of numerous hazardous substances on-site, it would be beneficial to identify credible and realistic scenarios under which toxic gas substances might be released in large quantities. Does the Proponent possess any means to monitor air quality that could result from a toxic gas release? Are there any alternate muster points if the wind blows a toxic gas in the direction of the assigned muster point? Clarity on these matters is essential for ensuring effective risk management and emergency response protocols.	ECCC suggests that the Proponent indicates which toxic gas(es) is/are at risk of being released for the presented scenario and a description of preparedness measures to address such releases. Further, ECCC encourages the Proponent to specify its air quality monitoring practices within the context of that emergency scenario. ECCC suggests that the Proponent identify what type of air monitoring is accessible [e.g., 4-gas detectors, fixed/portable detectors, LEL detectors or PIDs (Photoionisation Detectors)].	Agnico Eagle acknowledges ECCC recommendations and will include the above-mentioned components in the next version of the Emergency Response Plan.	Emergency Response Plan in Appendix 46 of the 2024 Meadowbank Complex Annual Report
ECCC	Emergency response guidebook	240330-03MN107 16MN056-Appendix 46-IA1E, Section 13.4 Cyanide involved in Fires, p.119	The Proponent mentions the use of the Emergency Response Guidebook 2016 by the incident commander as a reference for addressing fires of sodium cyanide.  ECCC would like to inform the Proponent that the latest version of the Emergency Response Guidebook is the 2024 edition. Additionally, a free training package on the book is available upon request.	ECCC recommends utilizing the latest version of the Emergency Response Guidebook 2024 as it provides the most up-to-date information. Additionally, Emergency Response Team training should incorporate best practices demonstrated in the free training package to ensure effective utilization.	Agnico Eagle acknowledges ECCC recommendations and has already implemented the 2024 Emergency Response Guidebook within the Meadowbank Complex and will update the information in the next version of the Emergency Response Plan.	Emergency Response Plan in Appendix 46 of the 2024 Meadowbank Complex Annual Report
ECCC	Aircraft – Low Flights	Meadowbank Complex – 2023 Annual Report, Appendix 39: Meadowbank and Whale Tail 2023 Wildlife Monitoring Summary Report, 61-000-100-REP-006, 28 March 2024.  - Reviewing methods with the Terrestrial Advisory Group (TAG) and helicopter contractor to discuss decisions made for take-off/landing and short versus long-range flights; - Improving comments for reasons for low flights, even if flying low for only a portion of the flight; and - Considering error for flight altitude measurements as well as error for Latitude and Longitude provided from aircraft monitoring.	Page 4-29 of the Meadowbank and Whale Tail 2023 Wildlife Monitoring Summary Report states: “Eleven percent of all short-range flights in 2023 (27.8 hours) were identified below the minimum requirement (300 m), without documentation of the purpose of low flight...  32.0% of long-range flights in 2023 (28.9 hours) were identified below the minimum height requirement, without documentation of the purpose of low flight...  Overall, 16% of all flight hours in 2023 (56.7 hours) were identified as operating below the project specific flight restrictions, without documentation for the purpose of low flight.”  The majority of low flights occur during the summer, which overlaps with migratory bird breeding season in this area (N9 and N10 ranges from mid-May to mid-August).  The area also includes a number of caribou freshwater crossings included in the 2021 Draft Nunavut Land Use Plan which could be impacted by low flights.  Agnico Eagle plans to improve compliance rates for low flights in 2024 by:  - Reviewing methods with the Terrestrial Advisory Group (TAG) and helicopter contractor to discuss decisions made for take-off/landing and short versus long-range flights; - Improving comments for reasons for low flights, even if flying low for only a portion of the flight; and - Considering error for flight altitude measurements as well as error for Latitude and Longitude provided from aircraft monitoring.	1. ECCC recommends that the proponent improve low flight compliance in 2024 by: a. Reminding pilots that the migratory bird breeding season in this area ranges from mid-May to mid-August;  b. Considering the proposed designations of caribou crossings and Thelon River Areas of significance under the Draft Nunavut Land Use Plan in discussions with the Terrestrial Advisory Group (TAG); and  c. Including all planned mitigation and adaptive measures into the updated Terrestrial Environment Monitoring Plan (TEMP version 9), which is required for submission to the NIRB later in 2024.  2. ECCC recommends that the updated TEMP (version 9) planned for submission in 2024 be made available for review.	a. Agnico Eagle will continue to work with helicopter contractors and pilots to inform them on the items noted by ECCC.  b. Agnico Eagle will consider the proposed designations of caribou crossings and Thelon Areas of significance under the Draft Nunavut Land Use Plan in discussions with the TAG.  c. The TEMP includes all planned mitigation, action thresholds and management actions and these are not anticipated to change in the updated TEMP that is under review with the TAG.  2. Agnico Eagle acknowledges ECCC's recommendation and will make effort to have the updated TEMP available for ECCC review.	TEMP V9 in Appendix 38 of the 2024 Meadowbank Complex Annual Report
ECCC	Waterfowl Nest Monitoring Results	Meadowbank Complex – 2023 Annual Report, Appendix 39: Meadowbank and Whale Tail 2023 Wildlife Monitoring Summary Report, 61-000-100-REP-006, 28 March 2024, “Assessing and Mitigating the Impacts of Mining-Induced Flooding on Arctic-Nesting Birds” (Holmes 2022).	2023 Wildlife Monitoring Summary Report, page 14-1: “The Whale Tail expansion required the construction of two dykes within Whale Tail Lake to divert water from the proposed pit to surrounding lakes and tributaries, resulting in flooding that with potential impacts to migratory birds and their nests... The complete analysis and report on behavioural responses will be included in a second Trent University MSc Thesis manuscript, expected to be submitted prior to September 2024. References for any publications produced in 2024 will be provided in the 2024 Annual Report.”  ECCC could not find the report “Assessing and Mitigating the Impacts of Mining-Induced Flooding on Arctic-Nesting Birds” (Holmes 2022).	1. Please provide link or copy or reference to previous submission regarding the report “Assessing and Mitigating the Impacts of Mining-Induced Flooding on Arctic-Nesting Birds” (Holmes 2022).  2. Please provide new publications in an appendix for 2024 Annual Report.	1. Agnico Eagle added in Appendix A of this document a copy of the report ‘Assessing and Mitigating the Impacts of Mining-Induced Flooding on Arctic-Nesting Birds’ (Holmes 2022).  Reference Holmes, G. I. (2022) Assessing and Mitigating the Impacts of Mining-Induced Flooding on Arctic-Nesting Birds. Trent University MSc Thesis. Available at: <a href="http://digitalcollections.trentu.ca/objects/etd-976">http://digitalcollections.trentu.ca/objects/etd-976</a>  Note: The above online digital collection for Trent University was not functioning at the most recent time of access in July 2024. However, the document link is accessed at: <a href="https://ocul-tu.primo.exlibrisgroup.com/discovery/fulldisplay?docid=alma99100915966805159&amp;context=L&amp;vid=01OCUL_TU:TU_DEFAULT&amp;lang=en&amp;search_scope=OCULDiscoveryNetworkNew&amp;adaptor=Local%20search%20Engine&amp;tab=OCULDiscoveryNetwork&amp;query=any,contains,Assessing%20and%20Mitigating%20the%20impacts%20of%20Mining-Induced%20Flooding%20on%20Arctic-Nesting%20Birds&amp;mode=basic">https://ocul-tu.primo.exlibrisgroup.com/discovery/fulldisplay?docid=alma99100915966805159&amp;context=L&amp;vid=01OCUL_TU:TU_DEFAULT&amp;lang=en&amp;search_scope=OCULDiscoveryNetworkNew&amp;adaptor=Local%20search%20Engine&amp;tab=OCULDiscoveryNetwork&amp;query=any,contains,Assessing%20and%20Mitigating%20the%20impacts%20of%20Mining-Induced%20Flooding%20on%20Arctic-Nesting%20Birds&amp;mode=basic</a>  2. Agnico Eagle will provide any new publications as appendices in the 2024 Annual Report.	Section 14 of the 2024 Wildlife Monitoring Summary Report in Appendix 39 of the 2024 Meadowbank Complex Annual Report
ECCC	Species at Risk, Effects and Missing Measures	Meadowbank Complex – 2023 Annual Report, 61-000-100-REP-006, April 2024, Species at Risk Public Registry.	Term and Condition No. 35 of Project Certificate No. 008 requires the proponent to ensure that the mitigation and monitoring strategies developed for Species at Risk are updated as necessary. As a matter of best practice, Committee on the Status of Endangered Wildlife in Canada (COSEWIC)-assessed species should be assessed similarly to those listed under the Species at Risk Act (SARA).  The Proponent has not identified all species at risk that are likely to be present in the Project area and the associated adverse effects of the Project. Harris's Sparrow (Zonotrichia querula) has been listed as a species of Special Concern by COSEWIC since April 2017 and has been listed as a species of Special Concern on Schedule 1 of SARA since February 2023.  The Project may have adverse effects on Harris's Sparrow including the following: direct habitat loss; impacts due to noise; dust or other sensory disturbances; wildlife injury or mortality; exposure to toxic or hazardous substances; and wildlife attraction.	ECCC recommends the Proponent: a) Identify adverse effects of the Project on the Species at Risk likely to be affected and their critical habitat.  b) Ensure that measures are taken to avoid or lessen those adverse effects and monitor them to inform adaptive management; and  c) Update the next version of the TEMP to include all Species at Risk that are likely to be present in the Project area, and update associated mitigation of project effects.  As species are assessed and listed on a regular basis, ECCC recommends the Proponent consult the Species at Risk registry to obtain the most current information for their operations.	ECCC's recommendations are already present in the TEMP. Species at risk registries are reviewed annually for updated information on new species at risk and recovery plans are included when applicable. Consistent with ECCC, the TEMP identifies direct and indirect effects to habitat and injuries and mortalities as potential effects and associated monitoring for species at risk.  According to the Cornell Lab All About Birds (Cornell 2024) the Meadowbank Mine does not occur within the annual and breeding distribution of Harris's sparrow. According to the resource e-bird data base of 2019 to 2024 species observations (Cornell 2024). According to COSEWIC assessment status report (COSEWIC 2017), Harris's sparrow's northern most occurrence is near Rankin Inlet, which is approximately 250 km south of Baker Lake, NU (COSEWIC 2017); the closest community to the Mine. Agnico Eagle does not agree that the Meadowbank Mine TEMP needs to be updated to include Harris's sparrow as a Mine-associated species at risk.  References Cornell (Cornell Lab). 2024. All about birds. University of Cornell website: <a href="https://www.allaboutbirds.org/news/">https://www.allaboutbirds.org/news/</a> . Accessed July 15, 2024.  COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2017. COSEWIC assessment and status report on the Harris's Sparrow Zonotrichia querula in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. x + 36 pp.	Section 1.5 of the TEMP V9 in Appendix 38 of the 2024 Meadowbank Complex Annual Report
TC	Shipping Management Plan - Ballast Water	2021 Annual Report, Appendix 56: Shipping Management Plan Version 4 (April 2022), Section 7	An updated Shipping Management Plan was not provided with the 2023 Annual Report. Version 4 of the Shipping Management Plan does not reflect the current requirements of the Ballast Water Regulations (SOR/2021-120).  Transport Canada's ballast water exchange and treatment requirements were updated in the Ballast Water Regulations, SOR/2021-120, that came into force on June 3, 2021, and which implement the Ballast Water Management Convention in Canada. Treatment and water quality standards applicable to ballast water discharged within Canada will be coming into effect in 2024 using a phase-in approach until 2024. From the date of entry into force of the Ballast Water Management Convention (September 8, 2017), all vessels must conform to at least the D-1 standard (exchange); and all new vessels, to the D-2 standard (treatment) (refer to the infographic attached). Note that Canadian vessels that don't voyage internationally, other than to U.S. Great Lakes waters, or on the high seas need to meet Convention standards and the Ballast Water Regulations no later than September 2024 or September 2030, depending on when they were built.  • Ballast Water Regulations Ballast Water Regulations (justice.gc.ca) • <a href="https://tc.canada.ca/en/marinetransportation/marine-safety/list-canada-designated-alternate-ballast-water-exchange-area-fresh-waters-tp-13617e-2021#item2">https://tc.canada.ca/en/marinetransportation/marine-safety/list-canada-designated-alternate-ballast-water-exchange-area-fresh-waters-tp-13617e-2021#item2</a>	Transport Canada requests that: 1. AEM update Section 7 – Shipping Management Plan be updated to reflect the requirements of the Ballast Water Regulations.  2. A new version of the Shipping Management Plan be included with the 2024 Annual Report.	Agnico Eagle will update relevant sections of the Shipping Management Plan to reflect the current Ballast Water Regulations (SOR/2021-120) in the next update of the Plan.  Agnico Eagle would like to note the contracted shipping companies comply with all applicable regulations, including the Ballast Water Regulations, and that the Shipping Management Plan update is not required annually, but as needed when changes occur.	Shipping Management Plan in Appendix 59 of the 2024 Meadowbank Complex Annual Report
HC	HHRA problem formulation – exposure pathways	2023 Annual Monitoring Report, Section 8.19 – Country Foods (Monitoring), PDF pg. 38-7; 2023 Annual Monitoring Report, Appendix 40: 2023 Wildlife and HHRA Country Foods Screening Level Risk Assessment Plan Version 9, Section 3.1.1: Exposure Pathways, PDF pg. 29; 2023 Annual Monitoring Report, Appendix 39: 2023 Wildlife Monitoring Summary Report, Appendix G: Hunter Harvest Study (HHS), Section 7.3 & Figure 7.1, pg. 29-30; Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment. Section 7.1.1, Identification of Study Boundaries PDF pg. 14.	The rationale for exclusion of fish from the Country Foods Screening Level Risk Assessment Plan is insufficient and may not be protective of human health in future use scenarios.  Specific country foods evaluated in the Country Foods Screening Level Risk Assessment Plan are listed in Section 3.1.1 of Appendix 40 and include caribou and Canada goose. Fish consumption remains excluded because of the “no fishing policy” at the project site targeting mine employees and the non-migratory nature of the fish.  The current rationale for excluding fish does not appear to consider a non-employee/local harvester exposure pathway. Information on recent and current fishing in lakes near the mine sites (e.g., Wally Lake, 2nd & 3rd Peninsula Lake, Whale Tail Lake, Kangisulik Lake, etc.) would help characterize use and describe the operability of this potential exposure pathway.  Relevant information could be obtained from: • Creel Surveys (HHS); • Engagement with harvesters; and/or, • Dietary surveys.  Consideration of potential future use scenarios during decommissioning, closure and post-closure phases of the project, where infrastructure will remain on-site (e.g., tailings impoundment), is also recommended as part of a complete rationale for including/excluding fish consumption from future risk assessments related to country foods <sup>2</sup> .  <sup>2</sup> Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment	HC recommends including consumption of fish in the potential exposure pathways for the Country Foods Screening Level Risk Assessment Plan or providing data that demonstrates that fish from the lakes near the mine site are not being consumed now and in the future.	Current fishing locations: Beyond the FEIS stage, consumption of fish was not included in country foods assessments because no-fishing policies are in place for workers and consumption of fish from project lakes was expected to be negligible. Creel surveys are completed annually, and recent reports continue to indicate that fish are not caught by local harvesters in lakes near the Meadowbank Complex (e.g. Second and Third Portage Lakes, Wally Lake, Whale Tail Lake, Kangisulik Lake, etc.). Complete results are provided each year in the annual Wildlife Monitoring Summary Report (Hunter Harvest Survey), and locations of successful catch in 2023 are copied below (Figure 2). Regardless of success rate, creel survey results indicated that fishing does not generally occur beyond the immediate areas of Baker Lake, Whitehills Lake, and the southern portion of the AWAR. It was determined that study participants are less willing to travel long distances to catch fish, regardless of AWAR access, likely due to the abundance of fish near the Hamlet of Baker Lake and around Whitehills Lake. Therefore, in keeping with Health Canada's recommendation, Agnico Eagle concludes that consumption of fish from the project lakes remains an incomplete exposure pathway under the current operational scenario but will continue to review annual creel survey results in this context. It is also noted that monitoring of mercury concentrations in fish tissue are conducted under the Mercury Monitoring Plan for the Whale Tail Mine. Results are compared to FEIS predictions, including consumption guidelines, and will be summarized in the HHRA-country foods report.  Future fishing locations: Consumption of fish by members of the public will however be considered in the closure-phase HHRA as a complete pathway, since fishing is a possible activity in the lakes following the closure of the mine. This assessment will be included in the HHRA in support of the Closure and Reclamation Plan.	2024 Wildlife and Country Foods Screening Level Risk Assessment Report in Appendix 40 of the 2024 Meadowbank Complex Annual Report