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August 18, 2015

Ms. Kelli Gillard
Technical Advisor and Monitoring Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, Nunavut
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kgillard@nirb.ca

Re: 05MN047 2014 Annual Report - Responses to Comments Received

Dear Ms. Gillard;

With respect to the *2014 Annual Report for Doris North Gold Mine Project Certificate NIRB No. 003* submitted to the NIRB April 29, 2015, and in response to the comments received by interested parties on or before the comment period closing date of July 2 or July 10, 2015 (extended), TMAC Resources Inc. is pleased to provide responses below. Parties were requested to comment with respect to their jurisdiction and/or area of expertise on the following:

- 1. Compliance Monitoring (authorizing agencies and government departments)**
 - a. Provide any compliance monitoring and/or site inspection reports to the NIRB including the following information:
 - i. How the authorizing agency has incorporated the terms and conditions from the Project Certificate into their permits, certificates, licences or other government approvals, where applicable;
 - ii. A summary of any inspections conducted during the 2014 reporting period, and the results of these inspections; and
 - iii. A summary of TMAC's compliance status with regard to authorizations that have been issued for the Project, where applicable
- 2. Effects monitoring (all agencies)**
 - a. Whether the conclusions reached by TMAC in the 2014 Annual Report are valid;
 - b. Any areas of significance requiring further studies; and
 - c. Changes to the monitoring program which may be required as the project moves out of care and maintenance.

Comments were received from AANDC, DFO, EC, GN and KIA. These comments are tabulated below, with responses and/or clarifications for each item.

Should you have any questions regarding the responses, or require any further information, please contact me at john.roberts@tmacresources.com.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John Roberts', with a stylized flourish at the end.

M. John Roberts
Vice President, Environmental Affairs
Hope Bay Project
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ITEM	TOPIC/ REFERENCE	PARTY COMMENT	PARTY REQUEST / RECOMMENDATION	TMAC RESPONSE
AANDC Comments July 10, 2015				
i. How the authorizing agency has incorporated the terms and conditions from the Project Certificate into their permits, certificates, licences or other government approvals, where applicable				
<i>Project Certificate Reference: #1, #2, #3, #10, #13 - #16, #18, #19, #31, #32, #33</i>				
AANDC1	Compliance	The operator has obtained a Type A Water Licence (2AM-DOH0713) [sic] and a Land Lease for the land occupied by the Jetty constructed in Roberts Bay (Jetty Lease 77A/3-1-2). The Project Certificate references (3, 10, 13-16, 18, 19, 21, 32, and 33 have been incorporated into the relevant permit or licence. Considering the Doris North was placed into care and maintenance in 2014 [sic], some Project Certificate references contingent on the mine being in operation are not applicable at this time. AANDC also notes that TMAC is intending to amend the Doris North Project Certificate (No. 003) and Water Licence, and will incorporate these changes into permits and licences accordingly.		Acknowledged.
<i>Project Certificate Reference #28</i>				
AANDC2	Compliance	The Doris North Socio-Economic Monitoring Committee met to review and discuss results from the 2014 Doris North Socio-Economic Monitoring Program. TMAC produced a 2014 socio-economic monitoring report in a manner that was consist with past reporting, enabling comparisons at the regional level. While there was no meeting of the Kitikmeot Socio-Economic Committee, it is anticipated that the report will be shared with the affected communities at a Kitikmeot Socio-Economic Committee in September of 2015. In	<i>Share SEM report with affected communities this coming fall, planned changes to SEM program to be shared with DNSEM Committee and Kitikmeot SEM Committee.</i>	Acknowledged.

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		consideration of potential upcoming changes to the Doris North project, the parties to the Doris North Socio-Economic Committee agreed to formally re-open the Doris North Socio-Economic Program in order to ensure it is updated, relevant and consistent with socio-economic monitoring happening elsewhere in Nunavut. Thus, it is anticipated that some of the socio-economic indicators will change in the 2015 report. These will be shared and discussed with members of the Doris North Socio-Economic Committee and the Kitikmeot Socio-Economic Committee.		
Commitments: Health Services: #4, #8 Safety and Protection Services: #1, #2, #3 Social Services: #1, #3, #7, #8 Employment: #4, #5, #6, #7, #8 Economy: #1 Education and Training: #2, #4, #5, #7, #9, #10, #11, Business Opportunities: #1, #2, #11				
AANDC3	Compliance	Many of the commitments referenced in Appendix A are discussed at the Kitikmeot Socio-Economic Monitoring Committee. A number of indicators relevant to the commitments are included in the Doris North Socio-Economic Monitoring Program. It is anticipated that these will be refined, discussed further, and ultimately presented in a mutually agreed upon format in the 2015 Doris North Socio-Economic Monitoring report.	<i>2015 DNSEM Report will reflect changes to SEM indicators as agreed upon by parties.</i>	Acknowledged.
ii. A summary of any inspections conducted during the 2014 reporting period, and the results of these inspections				
AANDC4	Compliance	As stated in TMAC's 2014 NIRB Annual Report (pg 12-13), AANDC Inspectors conducted site inspections April 23-24, and July 16-17, 2014, and found there to be no outstanding compliance concerns. The Doris North site was placed into care and maintenance for the duration of 2014, with little personnel on site and activity resulting in limited impacts.	<i>Ensure secondary containment for all hoses, lines and connecting points with potential for spills, ensure secondary containments kept free of snow/precipitation.</i>	All waste stockpiled at site in anticipation of KIA approval for the non-hazardous waste Landfill approved under the NWB Water Licence 2AM-DOH1323, is maintained secured in seacans at the Roberts Bay waste management area. The seacan are inventoried as to contents, and otherwise remains centralized and secure pending final disposition.

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		<p>Waste segregation practices at the Doris North site have been excellent; however, as the waste has not been removed from the site in the anticipation of receiving approval from the Kitikmeot Inuit Association, the AANDC Inspector noted that waste has been excessively stockpiled at site as a result.</p> <p>In addition, the AANDC Inspector noted that fuel storage should include secondary containment for hoses, vales [sic], and other connecting points likely to be a source of a potential leak. Further, berms should be cleaned of snow regularly to avoid compromising the capacity of the berm in the event of a leak. Action items pertaining to these issues were outlined by the AANDC Inspector in the Inspection Report dated April 23, 2014.</p>		<p>A summary of the April 23, 2014 AANDC inspection findings, and TMAC's responses to the findings, were provided in the <i>2014 Annual Report for Doris North Gold Mine Project Certificate NIRB No. 003</i>, on pg. 12. A program to provide containment/spill control on fuel lines and various fueling connections was implemented immediately. In general, fuel storage containments are kept free of snow and water on a routine basis and to the extent practicable.</p>
iii. A Summary of TMAC's compliance status with regard to authorizations that have been issued for the Project, where applicable				
AANDC5	Compliance	The water licence and Crown lease inspections were carried out April 23-24 and July 16-17 of 2014 by an AANDC Inspector, and were completed with generally satisfactory outcomes and with no outstanding compliance issues.		Acknowledged.
a. Whether valid conclusions reached by TMAC in the 2014 Annual Report are valid				
AANDC6	Effects Monitoring	<p>AANDC is of the opinion that the information provided by TMAC is sufficient given the Doris North Project has not yet been in operation. In the 2014 Annual Report, TMAC states that the Doris North project was under care and maintenance for the duration of 2014 and as such "a complete analysis of whether or not the project is operating in accordance with the predicted impacts identified in the FEIS or at the Final Hearing cannot be completed until the</p>	<p>In consideration of this, AANDC encourages TMAC to continue to conduct monitoring studies and reporting results for interested parties to review.</p>	<p>In accordance with the requirements of the Project Certificate and NWB Water Licence requirements, monitoring and reporting is on-going and interested parties are provided opportunity to review results.</p>

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		<i>production at Doris North begins...because the project impacts are based on the project being in operation". In consideration of this, AANDC encourages TMAC to continue to conduct monitoring studies and reporting results for interested parties to review.</i>		
b. Any areas of significance requiring further studies				
AANDC7	Effects Monitoring	AANDC has no comments to offer the NIRB at this time relating to this request.		Acknowledged.
c. Changes to the monitoring program which may be required as the projects moves out of care and maintenance				
AANDC8	Effects Monitoring	AANDC cannot offer comment at this time pertaining to changes in the monitoring program should the project move out of care and maintenance, as AANDC anticipates monitoring programs are likely to change with the NIRB's review of TMAC's application for a Project Certificate amendment. However, AANDC looks forward to working with TMAC, the NIRB, and other interested parties in developing appropriate monitoring measures commensurate with the change in project activities associated with the amendment review.		Acknowledged.
DFO Comments July 7, 2015				
DFO1	Compliance Monitoring	DFO-MPP did not issue any new <i>Fisheries Act</i> Authorizations for the Doris North Project in 2014		Acknowledged.
DFO2	Compliance Monitoring	DFO-FPP did not conduct any monitoring site visits in the 2014 reporting period		Acknowledged.
DFO3	Compliance Monitoring	TMAC is in compliance with the Fisheries Act authorizations issued to date for the Doris North Project. i. As noted by TMAC in the Annual Monitoring Report the proposed		Acknowledged.

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		<p>upgrades to the Jetty in Roberts Bay included in <i>Fisheries Act</i> Authorization NU-10-0028 including the fish habitat compensation have not yet been constructed.</p> <p>ii. The proposed works which were authorized in <i>Fisheries Act</i> Authorization NU-02-0117.2 and NU-02-0117.3 have been constructed as has the fish habitat offsetting. Monitoring of the fish habitat offsetting which was constructed is ongoing.</p>		
DFO4	Effects Monitoring	Based on DFO-FPP's review of the 2014 Annual Report, DFO has concluded that the conclusions reached by TMAC are valid as they relate to DFO-FPP's mandate.		Acknowledged.
DFO5	Effects Monitoring	DFO-FPP has not identified any area of significance requiring further studies.		Acknowledged.
DFO6	Effects Monitoring	DFO-FPP has not identified any changes to the monitoring program which may be required as the project moves out of care and maintenance.		Acknowledged.
Environment Canada comments July 10, 2015				
EC1	Effects Monitoring	As submitted to NIRB, the Report contains summary information related to the Aquatic Effects Monitoring Program (AEMP), which references complete details and results that appear not to have been submitted to NIRB. Similarly, monitoring results from other aspects of the Project (such as incinerator operating temperature logs) appear not to have been submitted.		<p>In the Annual Report to NIRB, only summaries of the monitoring programs are provided; readers are requested to refer to the full reports for complete information. Refer to Item EC2 below for further explanation of the location and timing of the AEMP reporting.</p> <p>TMAC is not aware of a requirement to submit incinerator operating temperature logs to the NIRB. Monitoring results from incinerator</p>

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				<p>operations (to determine compliance with the Canada Wide Standards (CWS) for Dioxins and Furans as stipulated in Part 30 of the NIRB Project Certificate 003) are provided to NIRB in the form of annual stack test emissions monitoring reports for years in which incineration activities require stack testing (these reports are available on the NIRB and NWB public registry). These results are also provided to the NWB in Annual Reporting. The last stack test performed in 2012 confirmed the incinerator emissions were compliant with the CWS, and comprehensive waste segregation and proper waste batching practices have continued since 2012 and through the change in project ownership to present. Incinerator operations are conducted in accordance with an Incinerator Management Plan approved by the NWB. This plan includes references to processes outlined in the EC <i>Technical Document for Batch Waste Incineration</i>, including incinerator operations records-keeping. The records generated for incinerator operations (including operating temperatures during each waste batch burned) are maintained on site and available for review at any time by an Inspector.</p>

EC2	Effects Monitoring	In correspondence to NIRB dated June 23, 2014, EC stated: "EC requests that the Proponent provide a comprehensive AEMP along with the annual report for the Project in 2014." EC notes that the Proponent did not comply with this request and EC is concerned by the Proponent's failure to provide comprehensive information.		The 2014 Doris North AEMP Monitoring Report was not fully finalized by the NIRB Annual report submission due date of April 30. In the responses to the comment by EC on the 2013 AEMP summary section, EC was directed to the location on the NWB public registry where the full AEMP, and previous years' AEMP reports can be located. Annually, the AEMP reports may not be finalized by the NIRB Annual Report due date, but readers can be directed to the appropriate location on the NWB public registry to access the information. The 2014 AEMP Monitoring Report can be found here: ftp://ftp.nwb-oen.ca/1%20PRUC%20PUBLIC%20REGISTRY/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1323%20TMAC/3%20TECH/9%20MONITORING%20%28J%29%28K%29/K7%20AEMP/ Prior year's AEMP reporting can be found here: ftp://ftp.nwb-oen.ca/1%20PRUC%20PUBLIC%20REGISTRY/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1323%20TMAC/3%20TECH/9%20MONITORING%20%28J%29%28K%29/K10%20Aquatic%20Effects%20Monitoring/
EC3	Effects Monitoring	Due to the lack of complete information provided in the Report, EC is unable to draw conclusions concerning impacts of the Project.		See response above at Item EC1 and EC2 re: summaries included in the NIRB Annual Report and location and timing of complete compliance monitoring reports.
EC4	Compliance Monitoring	No authorizations from EC have been issued.		Acknowledged.
EC5	Compliance Monitoring	An inspection of the Project site was completed in October 14-16, 2014 by Environmental Enforcement Officers from EC for the purposes		Acknowledged.

		of verifying compliance with CEPA (particularly the Environmental Emergencies Regulations and the Interprovincial Movement of Hazardous Waste Regulations). As the Project site is located on Inuit Owned Lands, CEPA Part 9 regulations, such as the Petroleum and Allied Petroleum Products Storage Tanks Regulations and the Federal Halocarbon Regulations, 2003 do not apply at the Project site.		
EC6	Compliance Monitoring	The site was also inspected to verify compliance with the Fisheries Act. Additionally, discussions with the Proponent occurred concerning when the Metal Mining Effluent Regulations would apply to the Project site.		Acknowledged.
EC7	Compliance Monitoring	No non-compliance issues were identified during the inspection.		Acknowledged.
GN Comments July 10, 2015 (refer to relevant monitoring report excerpts as noted in the party comments document for further detail)				
Doris North Socio-Economic Monitoring Committee: Project Certificate terms and condition 28				
GN1	2014 Doris North Annual Report Appendix B	<p>The Doris North Socio-Economic Monitoring Committee met as a group to review and discuss results from the 2014 Doris North Socio-Economic Monitoring Program (DNSEMP) that was submitted by TMAC to the NIRB. This report was consistent with past reports and in a manner that is consistent with the Socio-Economic Monitoring Committee (SEMC) reporting in order to enable comparisons at the regional level. While there was no meeting of the Kitikmeot SEMC in 2014, it is anticipated that the 2014 report will be shared with the affected Kitikmeot communities at the 2015 Kitikmeot SEMC meeting, scheduled for September.</p> <p>In consideration of potential upcoming changes to the Doris North project, parties of the Doris North Socio-Economic Monitoring Committee agreed to formally re-open the DNSEMP in order</p>	The GN appreciates Proponent's ongoing commitment to socio-economic monitoring and reporting through the DNSEMP and looks forward to working with the Proponent and other members of the Doris North Socio-Economic Monitoring Committee to review the DNSEMP.	Acknowledged.

		to ensure it is up to date, relevant, and consistent with socio-economic monitoring happening elsewhere in Nunavut. Thus, it is anticipated that some of the socio-economic indicators will change in the 2015 report with the intention to improve the overall effectiveness of the DNSEMP. Proposed changes will be shared and discussed with members of the Doris North Socio-Economic Monitoring Committee and the Kitikmeot Socio-Economic Monitoring Committee.		
<i>Project Certificate List of Commitments: Health Services #4, #8; Safety and Protection Services #1, #2, #3; Social Services #1, #3, #6, #8; Employment #3, #4, #11, #13, #16; Education and Training #9, #10; and Business Opportunities #2, #11</i>				
GN2	Doris North Project Certificate Appendix A; and 2014 Doris North Annual Report Appendix B	The Project Certificate Commitments referenced above have been addressed through discussions with the Kitikmeot Socio-Economic Monitoring Committee and through the Doris North Socio-Economic Monitoring Program (DNSEMP). Given the potential changes to the Doris North project, the Doris North Socio-Economic Monitoring Committee agreed to formally review the DNSEMP in order to ensure it is up to date and consistent with socio-economic monitoring efforts elsewhere in Nunavut. As such, indicators that are currently used to fulfill Project Certificate Commitments may be revised, refined, and ultimately presented in a mutually agreed upon format in future DNSEMP reports.	The GN will continue to work with the Proponent and the Doris North Socio-Economic Monitoring Committee to ensure that Project Certificate Commitments related to socio-economic monitoring are met.	Acknowledged.
Muskox Term and Condition 25, 26, 27				
GN3	TMAC Resources 2014 Annual Report for Doris North Gold Mine Project Certificate	Muskox sightings were frequent and year round in 2014. The increase in muskox abundance at this location from previous years could be explained by the re-colonization of muskox in this area. The Proponent stated that a herd of muskoxen required wildlife deterrence in 2014.	The GN recommends that due to these muskox sightings, the Proponent establish a muskox monitoring plan to assess the current habitat use of muskox in the vicinity of the mine site and track this habitat use with the increase in activity and development of the mine site.	As indicated in the November 19, 2014 <i>Hope Bay Wildlife Program Monitoring Memorandum</i> submitted in support of the responses to comments on the 2013 Annual Report, camera-based monitoring for interactions between muskox and project infrastructure has occurred historically and will continue along with the

	NIRB No. 003; 2014 WMMP Compliance Report		<p>Another option is for the Proponent to contribute to future Department of Environment surveys for muskox.</p> <p>The GN recommends instead of using wildlife deterrence methods when muskox come into contact with the project, the Proponent should cease project activities until the muskox have left the area.</p>	<p>recording and reporting of incidental observations. The Memorandum can be located here: http://ftp.nirb.ca/03-MONITORING/05MN047-DORIS%20NORTH%20GOLD%20MINE/03-ANNUAL%20REPORTS/02-PROPONENT/2013/02-Correspondence/141120-05MN047-Hope%20Bay%20Wildlife%20Monitoring%20Program%20Memorandum-IMTE.pdf</p> <p>The muskox deterrence that occurred in June 2014 near the Doris helipad was deemed necessary for the welfare of the animals, particularly the new offspring, should helicopter noise suddenly frighten the herd into a stampede, potentially injuring young. A GN Conservation Officer was consulted, and directions provided on how best to gently encourage the herd to move slightly away from the immediate proximity of the helipad. The dedicated site wildlife specialist guided the operation. A description of how this deterrence was conducted is described in Table 4.3-1 of the 2014 WWMP Monitoring Report. When and where possible, wildlife is given the right of way on the Project, but in circumstances where their proximity poses a danger to workers or the animals themselves, preventive action may be undertaken. This was such a case where deterrence was warranted for the protection of the wildlife.</p>
Grizzly Bear and Wolverine Monitoring 22, 25, 26, 27				
GN4	TMAC Resources 2014 Annual Report for Doris	The grizzly bear and wolverine DNA monitoring was discontinued during the care and maintenance phase and monitoring was conducted for these species using remote	Since the Doris North project is exiting care and maintenance and entering operations phase the GN recommends alternate plans be made for the grizzly	Condition 22 of the Project Certificate states, “MHBL, in consultation with GN-DoE and KIA, shall immediately begin the design and implementation of baseline data collection

	North Gold Mine Project Certificate NIRB No. 003	cameras.	bear and wolverine monitoring.	<i>methods to establish both the wolverine and grizzly bear population of the Hope Bay Belt region. Any baseline data results shall be reported to NIRB's Monitoring Officer.</i> " Appendix C, Item 27, indicates, "Miramar will discuss further with the GN DOE the merits of conducting an initial population estimate for wolverine using hair snagging techniques and DNA analysis." A full description of the baseline population monitoring efforts, including the DNA mark-recapture studies, was described in the November 19, 2014 <i>Hope Bay Wildlife Program Monitoring Memorandum</i> . No further DNA mark-recapture studies are proposed for the Project.
<i>Monitoring activities, potential effects of project on wildlife Term and Condition 25, 26, 27</i>				
GN5	TMAC Resources 2014 Annual Report for Doris North Gold Mine Project Certificate NIRB No. 003; 2014 WMMP Compliance Report	The Proponent has been conducting monitoring for this project for a long time (1995-2014) so several years of data are available but the Proponent's conclusions are based on qualitative rather than quantitative analyses. Based on the methods used (small sample sizes) and absence of statistical analyses it is difficult for the reviewer to determine if the project is having effects on wildlife. From the use of presence/absence sighting no quantitative assessment can be made as there is no effect that could be measured and tested statistically. This causes the reviewer to question the conclusions of the Proponent that there is no effect on wildlife.	The GN recommends the Proponent enlarge the scope of its annual monitoring report analyses to perform statistical tests to assess significant changes. The Proponent is recommended to use quantitative monitoring methods to increase the confidence in the conclusions drawn about project effects on wildlife. The GN recommends the Proponent update monitoring to include trend analysis.	Quantitative monitoring methods are employed for all ongoing VEC-specific monitoring programs (i.e., upland breeding bird, waterbird, and raptor programs). Remote camera data associated with the wildlife interactions monitoring program is also quantitative in nature. Sophisticated statistical analyses have been developed for these programs (e.g., upland breeding birds) as needed and as data have become available. Development of additional sophisticated statistical analyses will continue as the project moves out of care and maintenance and into production.
<i>Use of remote cameras for caribou monitoring Term and Condition 25, 26, 27</i>				
GN6	TMAC Resources 2014 Annual Report for Doris North Gold	The GN would like to mention that the Proponent is now contributing to the monitoring of the Dolphin and Union caribou herd under a Memorandum of Understanding (MOU) with the Department of Environment to fulfill Term and	Remote cameras are not an effective way to monitor for wildlife avoidance of the project area. The GN recommends alternate plans be made to monitor caribou avoidance of the project area.	The primary purpose of the camera program is to fulfill requirements to monitor for potential wildlife interactions with project infrastructure. Other monitoring requirements for caribou are addressed through contributions to regional

	Mine Project Certificate NIRB No. 003; 2014 WMMP Compliance Report	Condition number 27. The Dolphin and Union caribou herd are expected to be in the Hope Bay Belt, including Doris North, from early April to the end of May. The location and the vision field of the remote cameras may have failed to capture the presence of the Dolphin and Union caribou in the environment. Note that the Dolphin and Union caribou will be more prone to travel parallel to the Hope Bay Belt when travelling from south to the coast and back (April to May, October-December) whereas the Beverley and Ahlak caribou herds will cross the Hope Bay Belt to move from the east coast of Bathurst Inlet to reach their calving grounds in the Queen Maud Gulf Migratory Bird Sanctuary.		monitoring under the MOU with the GN.
Loss of Habitat 25, 26, 27				
GN7	TMAC Resources 2014 Annual Report for Doris North Gold Mine Project Certificate NIRB No. 003; 2014 WMMP Compliance Report	Using the entire range of a caribou herd to calculate loss of habitat has the potential to dilute the impacts the project activities could be having. Loss of habitat should not be done over the entire range of the species or the caribou herd but by its seasonal range around the project location.	The GN recommends the habitat loss assessment be done over the seasonal range of the species around the project location rather than over the entire range of the species.	Habitat loss was calculated in the environmental assessment area (EEA), which consisted of the Regional Study Area (RSA) from the Final Environmental Impact Statement (FEIS). The entire range of the caribou was not used. This will be clarified in future reports.
KIA Comments July 10, 2015				
i. How the authorizing agency has incorporated the terms and conditions from the Project Certificate into their permits, certificates, licences or other government approvals, where applicable - IIBA Summary				
K1	Compliance Monitoring	Terms and Conditions of the NIRB Project Certificate 003 are covered by the KIA's Framework Agreement (FA) and Inuit Impact and Benefit Agreement (IIBA) with TMAC Resources Inc.		Acknowledged.

		The comprehensive Framework Agreement and the IIBA satisfies all present and future obligations required under the NLCA.		
ii. A summary of any inspections conducted during the 2014 reporting period, and the results of these inspections				
K2	Compliance Monitoring	Concerning KIA's inspections of the Hope Bay Project in 2014, summary excerpts from KIA's internal reports for June and August [sic] are presented here for information (see comment correspondence July 10, 2015). From these inspections and just one conducted in June 2015 by KIA, it is evident that TMAC Resources Inc. responds to the information provided them by KIA and their own consultants and do actively maintain the mine site in accordance with its licences and permits.		Acknowledged.
a. Whether the conclusions reached by TMAC in the 2014 Annual Report are valid				
K3	Effects Monitoring	The habitat loss conclusion neglects a large portion of habitat loss. The total habitat loss predicted in the Final Environmental Impact Assessment (FEIS) for the project was 57 ha. The current footprint has a loss of 72.9 ha, a 21.8% increase over what was originally predicted. This represents a 0.5% increase in the amount of suitable habitat lost relative to the Local Study Area (LSA), from 1.8% to 2.3%. The incremental loss of suitable habitat in the environmental assessment ranged from 0.01% to 0.6% for caribou, grizzly bear, wolverine, upland breeding birds, waterfowl and raptors. These increases are considered minimal and the predictions of the FEIS on VECs remain valid in respect of the constructed footprint. However, the conclusion only acknowledges a 0.5% increase in the loss of suitable habitat relative to the LSA but does not note which suitability category of wildlife VEC this refers to.	The 21.8% increase in lost habitat over predicted lost habitat is unaddressed and requires acknowledgement. If progressive habitat loss continues, it will not appear significant when incremental, but could end up significant overall. Existing and further incremental increases in habitat loss should be evaluated as part of the total habitat loss relative to set thresholds rather than as an incremental increase.	Although the current footprint (72.9 ha) is 21.8% larger than the predicted footprint (57 ha), the current footprint represents 2.3% of the local study area (LSA). VEC-specific habitat loss was also calculated relative to the appropriate EAA (i.e., the RSA for mammals and LSA for birds). VEC-specific habitat loss ranged from 0.03 – 2.6% of the EAA, as presented in Table 5.3-2 and noted in the results section in the 2014 WMMP Compliance Monitoring Report. In addition to the assessments of habitat loss, the change in footprint was presented in terms of incremental change. However, conclusions were drawn based on total habitat loss and, despite differences in predicted versus actual footprint size, the loss of habitat in the LSA and RSA is still very low.

K4	Effects Monitoring	The conclusions pertaining to wolverine site use are based on limited data concerning wolverine site use and may be premature.	A number value should be provided for each conclusion presented in the annual report.	The information provided in the NIRB Annual Report is summary information only. Quantitative data are presented in the results section of the WMMP report. It is acknowledged that the number of wolverine detections is low, which is congruent with the results of two years of DNA-based mark-recapture studies that suggest low wolverine densities in the area.
K5	Effects Monitoring	The conclusions about causes for raptor nest success among locations are poorly supported. In paragraph 3 of the report, it states <i>“Raptor nest success (producing eggs) and productivity rates (producing chicks) were higher in the Treatment Area relative to the Control Area in 2014. Therefore it is possible that 2014 may have been a poor year for raptor breeding, potentially due to a snowfall event that occurred in early June when raptors were incubating eggs.”</i>	This explanation for the observed difference in nest success fails to acknowledge two additional possibilities: 1) the project site is proximate to more desirable and productive cliff nesting areas compared to control areas, and 2) small mammals are attracted to site due to access to food, or protection from predators, which increases access of raptors to available prey near the site. It would be worthwhile to provide information on the mean aspects of cliff habitat, along with median distances from aquatic habitats, within the treatment area vs the control area.	Raptor survey areas have approximately equal numbers of nesting territories in the treatment and control areas. The total number of productive nests in 2014 in the two areas was only 16, including 10 in the treatment area and 6 in the control area (see Table 9.3-2). This suggests that raptor productivity was low in 2014 in both treatment and control areas. Causes for differences in nesting success and productivity between treatment and control areas will be examined if significant differences between nesting success in treatment and control areas are observed.
K6	Effects Monitoring	The reporting pertaining to wildlife interactions should provide more information on the nature of the 11 reported wildlife interactions, as capturing these was the main goal of having wildlife camera monitoring during care and maintenance. Also, details of these encounters may warrant more consideration in terms of future monitoring and mitigation.	The reporting pertaining to wildlife interactions should provide more information on the nature of the 11 reported wildlife interactions, as capturing these was the main goal of having wildlife camera monitoring during care and maintenance. Also, details of these encounters may warrant more consideration in terms of future monitoring and mitigation.	Full descriptions of the 12* interactions recorded by the site wildlife reporting protocol are contained in the 2014 WMMP Monitoring Report at section 4, and summarized in Table 4.3-1. The information provided in the NIRB Annual Report is summary information only. In paragraph 1 of Appendix B of the NIRB Annual report, the reader is provided the following direction: <i>“Note that the following section provides only the summaries of the monitoring conducted. For complete details and results on each program, please refer to the full report.”</i> The interactions were recorded as part of the standard wildlife reporting procedures

				<p>at site, not as a part of the camera monitoring program.</p> <p><i>*An omission in the number of interactions recorded in 2014 was corrected upon finalization of the WMMP report, which occurred after the due date submission of the NIRB Annual Report, to bring the total number to 12.</i></p>
K7	Effects Monitoring	Concerning the deployment of cameras, the report states “...Cameras were deployed at Treatment sites (cameras within 1 km of infrastructure) and Control sites (cameras > 1 km from infrastructure) from September 2013 to August 2014. Several Treatment and Control cameras were set in strategic locations to monitor for interactions of certain wildlife species with specific Project facilities and natural habitat features”.	One km may not be sufficient distance from the project to be considered outside the “zone of influence”, and as a true control (even during care and maintenance). Evidence should be provided to support this 1 km ZOI assumption. Further, cameras were not placed systematically in the monitored areas. That is, an equal number of cameras in equivalent habitat types within control vs treatment areas. The current arrangement of cameras will not tell us much about control versus the impact on site use by wildlife.	<p>The primary purpose of the camera program is to fulfill requirements to monitor for potential wildlife interactions with project infrastructure. Ongoing VEC-specific monitoring requirements are addressed using the VEC-specific methods employed in the upland breeding bird, waterfowl, and raptor monitoring programs and through contributions to regional caribou monitoring under the MOU.</p> <p>The camera program is designed to have approximately equal numbers of treatment and control cameras to assist in determining whether site management actions have been effective in mitigating potential wildlife interactions with project infrastructure. For example, if waste management activities were not effective, grizzly bears, wolverines, wolves, and foxes might be detected close to project infrastructure more frequently than in control areas. However, this is not the case.</p>
K8	Effects Monitoring	Given the current arrangement of cameras, as the mine site comes out of care and maintenance and goes into production, camera locations should be reviewed.	<p>Camera locations should be reviewed to ensure that:</p> <ol style="list-style-type: none"> 1) Control and treatment camera locations reflect known zone of influence areas for wildlife VECs. This being control sites greater than 14 km away to account for ZOI for caribou 	The primary purpose of the camera program is to fulfill requirements to monitor for potential wildlife interactions with project infrastructure and is not intended to assist in determining ZOI or determine differences in wildlife habitat use. Ongoing VEC-specific monitoring requirements are addressed using the VEC-specific methods that are employed in the upland breeding bird,

			<p>2) Cameras are systematically placed and paired by habitat types being equally represented between control and treatment sites. That is placing an equal number of control and treatment cameras within heath tundra, sedge wetland, riparian habitat, etc...</p> <p>3) The number and placement of cameras should enable statistical conclusions about differences in wildlife habitat use</p> <p>4) Camera data should be collected and analyzed monthly to enable adaptive management and better responsiveness to issues that are noted regarding project-wildlife interactions.</p>	<p>waterfowl, and raptor monitoring programs and through contributions to regional caribou monitoring under the MOU.</p> <p>Camera locations have been selected to meet the objective of monitoring for potential wildlife interactions with project infrastructure and include control locations to assist in determining whether site management actions have been effective in mitigating potential wildlife interactions with project infrastructure as outlined in the response to K7, above.</p> <p>Regular facilities monitoring by on site personnel and wildlife incidence reporting enables timely responses to wildlife issues. For example, TMAC has an effective bear sighting program that ensures bear sightings are shared immediately among staff on site to help ensure the safety of both wildlife and on-site personnel. Evidence from the camera data collected to date suggests that there are few interactions with project infrastructure. Thus, coupled with facilities monitoring and incident reporting by on site personnel, there does not seem to be a need for more frequent camera data collection and analysis at this time.</p>
b. Any areas of significance requiring further studies				
K9	Effects Monitoring	The KIA does not believe that there are any new areas of significance which requires further studies.	The KIA believes that current monitoring programs established for the Hope Bay Project should continue and be enhanced appropriately as the project moves from care and maintenance into production.	Acknowledged.

c. Changes to the monitoring program which may be required as the project moves out of care and maintenance				
K10	Effects Monitoring	Two immediate changes to the monitoring program as the project moves out of care and maintenance into production are to enhance the use of cameras as discussed above and to initiate the Post-Environmental Assessment Monitoring Program (PEAMP) as further infrastructure is developed at the Doris North mine site.	Enhance camera use and initiate PEAMP.	<p>No changes to the camera program are recommended at this time for the reasons outlined in responses to K7 and K8, above.</p> <p>In accordance with commitments made in the Final Environmental Impact Statement (FEIS) and/or the Final Hearing, and monitoring plans submitted and/or updated subsequently to meet those commitments, TMAC will complete implementation of the PEAMP once commercial production at Doris begins. Project impact predictions are based on the project being in operation.</p>
K11		The KIA will have the 2014 WMMP annual report reviewed by our wildlife consultant for the formal recommendations in this area. The KIA has previously provided recommendations to NIRB concerning the WMMP in our June 28/13 response to the 2012 WMMP Annual Report and in our February 11/14 response to the 2013 WMMP Annual Report.	These previous recommendations along with the ones made above regarding the use of cameras in wildlife monitoring should be used as the basis of making further changes in the Wildlife Mitigation and Monitoring Program as Doris North comes out of care and maintenance and moves into production.	TMAC is planning a meeting including the KIA Inuit Environmental Advisory Committee (IEAC) for later this year, to discuss revisions and updates to the WMMP.