



Fish and Fish Habitat Protection Program
Arctic Region
301 – 5204 50th Ave. (Franklin)
Yellowknife, Northwest Territories
X1A 1E2

Programme de protection du poisson et de son habitat
Région de l'Arctique
301 – 5204 50th Ave. (Franklin)
Yellowknife, Territoires du Nord-Ouest
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March 19, 2026

Your file *Votre référence*
2AM-DOH1335

Subject: 2AM-DOH1335 Type A Water License; Amendment Application

To whom it may concern,

The Fish and Fish Habitat Protection Program of Fisheries and Oceans Canada (DFO) received your request for comments on February 3, 2026. DFO has reviewed Agnico Eagle Mines Limited’s Amendment Application for the Doris-Madrid (Hope Bay) Project Type A Water License No: 2AM-DOH1335 in regards to its mandate, i.e. the management, protection and conservation of fish and their habitats. The Nunavut Water Board (NWB) invited parties to submit comments.

DFO has reviewed the Amendment Application Main Document and the following appendices:

- App 1-A Evaluation of Change
- App 1-C Engagement Summary
- App 2-A NPC Determination
- App 4-C Analysis Increased Water Withdrawals
- App 6-A AEMP
- App 6-D Explosives Management Plan
- App 6-I Doris-Madrid ICRP
- App 6-L Quarry Management Plan
- App 6-M Spill Contingency Plan
- App 6-P Doris-Madrid Water Management Plan
- App 6-Q Conceptual Fish Offsetting Plan

DFO is generally agreeable with Agnico Eagle Mine’s amendment application and provides the following comments or concerns for the NWB’s consideration.

Comment Number:	DFO-1
Subject/Topic:	DFO Permitting Required
References:	Main Application Document and App 6-Q Conceptual Fish Offsetting Plan
Comment:	Gap/Issue: DFO cannot permit the proposed works until Agnico Eagle (the Proponent) submits a Request for Review (RFR) application covering the works in or near water discussed in the amendment application.

Conclusion/Request:	DFO and the Proponent have discussed the required approval process and timelines associated with the proposed amendment. Once the RFR is received, DFO will review the proposed works based on our mandate under the <i>Fisheries Act</i> and work with the proponent directly regarding issues pertaining to fish and fish habitat, potential offsetting options, and ensuring all permitting is in place before the work takes place.
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Comment Number:	DFO-2
Subject/Topic:	Offsetting Plan
References:	Main Application Document and App 6-Q Conceptual Fish Offsetting Plan
Comment:	Gap/Issue: As discussed in the previous comment, the conceptual offsetting plan has not been approved by DFO through the Fisheries Act Authorization review process.
Conclusion/Request:	DFO has not approved the current proposed offsetting in the Iqaluktuuttiaq Lake East Outflow System (EOS). Based on DFO's Offsetting Policy, offsets should last over the long term. As such, DFO recommends the Proponent reconsider the installation of a clear span bridge rather than the modification of existing culverts at the EOS.

Comment Number:	DFO-3
Subject/Topic:	Under-ice Lake Level Measurement in Doris Lake
References:	App 6-A Aquatic Effects Monitoring Plan
Comment:	Gap/Issue: "Discrete under-ice lake level measurement will also be collected in April at Patch, Imniagut, Ogama, P.O., Windy, Glenn, Little Roberts, and Wolverine lakes." (App 6-A AEMP, pp. 22). Doris Lake is currently not included in the under-ice lake level monitoring described above.
Conclusion/Request:	DFO requests the Proponent confirm that under-ice lake level monitoring of Doris Lake will be included in the year-round lake station monitoring and if not, requests Doris Lake be added to the list of lakes for under-ice lake level monitoring described above.

Comment Number:	DFO-4
Subject/Topic:	Response Framework / Action Levels for Water Quantity – Lake Levels and Stream Flow
References:	App 6-A Aquatic Effects Monitoring Plan
Comment:	Gap/Issue: No response framework or action levels are included in the AEMP for water quantity including lake levels and stream flow.

Conclusion/Request:	DFO requests the Proponent provide an updated AEMP that includes a response framework and action levels for water quantity, if lake levels or stream flow go below the predicted levels in the water license amendment application, should it be approved.
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Comment Number:	DFO-5
Subject/Topic:	Increased Shipping Associated with the Operational Update
References:	App 1-A Evaluation of Change and App 2-A NPC Determination
Comment:	Gap/Issue: Lack of information provided on the increased allowable number of vessels servicing the mine. Total allowable number of vessels is increasing from 7 (4 cargo and 3 fuel, NIRB Project Certification No. 009) to 20 (12 cargo and 8 fuel). However, no updated shipping management plan, mitigation measures, or assessed potential impacts are reported.
Conclusion/Request:	DFO recognizes that this issue may not fall under the purview of the Nunavut Water Board or be captured by this water license amendment. However, DFO requests the Proponent provide further information on the increase shipping servicing the project. An assessment of shipping related impacts associated with the increased number of vessels, updated shipping management plan, marine mammal monitoring program, underwater noise, and aquatic invasive species monitoring plans should be provided to regulators for review.

Comment Number:	DFO-6
Subject/Topic:	Blast Vibration Monitoring
References:	App 6-D Explosives Management Plan and App 6-L Quarry Management Pla
Comment:	Gap/Issue: While the DFO guidelines are referenced in both documents (App 6-D and App 6-L), a detailed description of the method of blast monitoring taking place for all blasting activities on site in the proximity of fish bearing water is limited within the reports.
Conclusion/Request:	DFO requests the Proponent provide further information on the methods, frequency, and locations of blast monitoring taking place to ensure blast vibrations do not exceed DFO guidelines. Detailed blast monitoring plans should be provided to DFO for review for all blasting activities taking place near fish bearing waters.

Yours sincerely,

A handwritten signature in black ink that reads "José Audet-Lecouffe". The signature is written in a cursive style with a large, stylized initial 'J'.

José Audet-Lecouffe
A/ Team Lead
Fish and Fish Habitat Protection Program
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