Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-DOH1335
Our file - Notre référence
GCDocs# 144446299

March 19, 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
sent via e-mail: robert.hunter@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Completeness Check for the Amendment Application for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335

Dear Robert,

Thank you for the February 3, 2026, invitation to review the above-referenced Type A Water Licence completeness check for the amendment application by Agnico Eagle Mines Limited for Water Licence No: 2AM-DOH1335.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) assessed the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC's Information Requests for the Nunavut Water Board's consideration in the attached memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at 873-452-2525 or jordan.beer@rcaanc-cirncac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Jordan Beer

Jordan Beer, M.Sc.,
Water Management Coordinator

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Completeness Assessment Memorandum

Date: March 19, 2026

To: Robert Hunter, Licensing Administrator, Nunavut Water Board

From: Jordan Beer, Water Management Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Completeness Check For the Amendment Application for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335**

Region: ☒ Kitikmeot ☐Kivalliq ☐Qikiqtani

A. BACKGROUND

The Hope Bay project is a gold mine operation in the Kitikmeot region of Nunavut, operated by Agnico Eagle Mines Limited (Agnico). The property includes three main deposit areas: Doris North, Madrid and Boston. The main camp, Doris, is located at approximately 68° 8' 18" N and 106° 36' 30", and the Madrid deposit is further south at approximately 68° 3' 41" and 106° 35' 35". Boston is licensed under a separate Water License. The project has been in Care & Maintenance since February 2022.

The project currently involves extensive infrastructure, including three underground mine portals, a 400 person camp and milling facilities (upgrades ongoing) at Doris, multiple quarries, ore pads, and fuel farms, and an all-weather road connecting the three project sites. Water management on site involves collection of water via sumps, contact water ponds (CWPs), sedimentation ponds and saline water ponds. Water is then either discharged directly to the tundra, transferred to the Tailings Impoundment Area (TIA), or treated and transported via pipeline to the Roberts Bay marine outfall.

Waste management for the Hope Bay Project involves multiple waste streams:

- Non-hazardous waste is either incinerated, composted, or deposited at the Quarry 2 landfill site.
- Hazardous waste is required to be stored in lined secondary containment until it can be shipped off site.
- Sewage and greywater are treated at the Sewage Treatment Plant, then either discharged to tundra or deposited into the TIA.
- Hydrocarbon contaminated soil is deposited at the landfarm for remediation.
- Sludge, contaminated soil/snow/ice/water, and tailings are deposited in the TIA.
- Waste rock is store on waste rock pads and/or used for mine backfill.

Agnico is seeking an amendment for the existing license, and proposing a new license expiration date of 2048 (22 year license term). The following amendments have been submitted for approval:

- A redesign of ore processing mill at Doris to optimize production to increase capacity up to 8,000 tonnes per day.
- A transition to dry-stacked and filtered tailings.
- An increase of diesel fuel storage at Doris (extra 5 ML), Madrid (extra 10 ML) and Roberts Bay (extra 34 ML).
- An increase in Jet-A fuel storage at Roberts Bay by 2 ML.
- Widening the Windy Road to support mining at Madrid while safely accommodating higher traffic between Doris and Madrid sites.
- An increase in water withdrawal from Doris Lake (Extra 707,125 m^3) and Windy Lake (extra 116,070 m^3).
- Relocating the Madrid South Portal to Patch 7.
- Two new waste rock stockpiles at Doris.
- Three new waste rock stockpiles and one expanded stockpile at Madrid.
- One new ore stockpile at Pad T at Doris.
- Three new ore stockpiles at Madrid.
- Relocation of the existing overburden stockpile at Madrid North to the proposed Naartok West portal.
- A second overburden stockpile adjacent to CWP 2.
- The addition of a second marine outfall diffuser to Roberts Bay.
- New CWPs at Doris and Madrid.
- A decrease in blasting from 4,633,000 kg/year to 3,650,000 kg/year across Doris, Madrid and Boston (licensed under 2AMBOS-1835).
- Increase in Doris camp size to from 400 people to 800 people, and construction of a 250 person camp at Madrid.
- The addition of seven 5.6 MW diesel generators at Doris and three 1.8 MW diesel generators at Madrid.
- Two new wind turbines at Doris and Madrid.

All proposed activities are set to remain within the existing permitted footprint.

A summary of the subjects of CIRNAC's Information Requests regarding the renewal and amendment application is provided in Table 1. Documents reviewed as part of this submission are listed in Table 2 of Section B. Detailed Information Requests are provided in Section C.

Table 1: Summary of CIRNAC's information Requests

Information Request Number	Subject
IR-01	Quantity of Water Involved
IR-02	Detailed Site Maps
IR-03	Items Listed as NA
IR-04	Missing Documents
IR-05	Design Assumptions and Limitations
IR-06	Annual Reporting Template
IR-07	Compliance Assessment
IR-08	Drainage Pathways
IR-09	Geology and Minerology
IR-10	Milling Plant Operations
IR-11	Camp and Mine Site Population Projections
IR-12	Predicted Climate Trends
IR-13	Information on Affected Water Courses
IR-14	Watercourse Flow Rates
IR-15	Source Water Quality
IR-16	Water Intake Pump
IR-17	Water Management Plan
IR-18	Ice Road Construction
IR-19	Water Storage Facilities
IR-20	Water Distribution
IR-21	Watercourse Crossings
IR-22	Watercourse Trainings
IR-23	Water Diversions
IR-24	Operations and Maintenance Plans
IR-25	Waste Generation: Quality and Quantity
IR-26	Sewage Processing Capacity
IR-27	Tailings Alternatives Assessment
IR-28	Discharge Criteria Rationale
IR-29	Emergency Response and Spill Contingency Plans
IR-30	Permafrost Protection
IR-31	Sampling Personnel
IR-32	Laboratory Contact Information
IR-33	Expected Water Quality and Quantity
IR-34	Proposed Water Works
IR-35	Saline Effluent Treatment Plant
IR-36	Blasting Quantities

Information Request Number	Subject
IR-37	Water from Proximal Sources
IR-38	Widening of Windy Road
IR-39	Quarry 2 Landfill
IR-40	Wolverine Lake
IR-41	Security

B. DOCUMENTS REVIEWED

The following table (Table 2) provides a summary of the documents reviewed under the submission.

Table 2: Documents Reviewed

Document Title	Author, File No., Rev., Date
260130 2AM-DOH1335_HopeBay-WLAmendment-App1-A-EvaluationofChange	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App1-B-SIG	Agnico Eagle Mines Limited, February 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App2-A_NPC-Determination	Nunavut Planning Commission, December 3 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App3-A_TIAFilteredTailingsPermittingConcepDesign	SRK Consulting, July 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App3-B_SalinePond1DesignRpt	AtkinsRéalis, December 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App3-C_CWP4DesignRpt	AtkinsRéalis, December 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-A_GeochemCharacterizationNaartokWest	SRK Consulting, July 2024
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-B_GeochemCharacterizationMadridNorth_Patch7	SRK Consulting, December 2024
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-C_AnalysisIncreasedWaterWithdrawals	ERM Consultants Canada Ltd., July 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-D_HydrogeologicalModelReport	SRK Consulting, January 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-E_InterimSourceTermReport	SRK Consulting, January 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-F_WBWQM-OperationalUpdate	SRK Consulting, July 2025

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Document Title	Author, File No., Rev., Date
260130 2AM-DOH1335_HopeBay-WLAmendment-App4-G_HydrodynamicModellingRobertsBay	Tetra Tech Canada Inc., January 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-A_AEMP_Jan2026_V4	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-B_DomesticWastewaterTreatmentPlan_Jan2026_V9	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-C_ERP_Jan2026_V7	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-D_ExplosivesMgmtPlan_Jan2026_V6	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-E_GroundwaterMgmtPlan_Jan2026_V5	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-F_HazardousWasteMgmtPlan_Jan2026_V8	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-G_HydrocarbonContamMatMgmtPlan_Nov2025_V5	Agnico Eagle Mines Limited, November 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-H_IncineratorComposterWasteMgmtPlan_Jan2026_V7	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-I_Doris-Madrid ICRP-V8	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-J_Non-hazardousWasteMgmtPlan_Jan2025_V2	Agnico Eagle Mines Limited, January 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-K_QAQCPlan_Nov2025_V15	Agnico Eagle Mines Limited, November 2025
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-L_QuarryMgmtPlan_Jan2026_V8	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-M_SpillContingencyPlan_V19_Jan2026	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBayWLAmendment-App6-N_DorisTIAOMSManual_Jan 2026_V9	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-App6-O_WasteRockOreBackfillMgmtPlan_Jan2026_V12	Agnico Eagle Mines Limited, January 2026

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Document Title	Author, File No., Rev., Date
260130 2AM-DOH1335_HopeBayWLAmendment-App6-P_Doris-MadridWaterMgmtPlan_Jan2026_V20	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-ApplicationForm-IMLE	Agnico Eagle Mines Limited, January 2026
260130 2AM-DOH1335_HopeBay-WLAmendment-MainApplicationDocument-IMLE	Agnico Eagle Mines Limited, January 2026
181207 2AM-DOH1335 Amended Licence-OCHE	Nunavut Water Board, December 2018
171221-12MN001-Volume 1. Main Volume-IMTE	TMAC Resources Inc., December 2017
171221-12MN001-Volume 2 Section 04. EA Methodology-IMTE	TMAC Resources Inc., December 2017
171221-12MN001-Volume 3, Project Description and Alternatives-IMTE	TMAC Resources Inc., December 2017
171221-12MN001-Volume 4 Section 07. Landform and Soils-IMTE	TMAC Resources Inc., December 2017
171221-12MN001-Volume 5 Section 01. Surface Hydrology-IMTE	TMAC Resources Inc., December 2017
171221-12MN001-Volume 5 Section 04. Freshwater Water Quality-IMTE	TMAC Resources Inc., December 2017
171221-12MN001-Volume 5 Section 05. Freshwater Sediment Quality-IMTE	TMAC Resources Inc., December 2017
220810 2AM-DOH1335 2022 Inspection Report-IMLE	CIRNAC, June 2022
230509 2AM-DOH1335 2023-KIT-JKM01-2AM-DOH Inspection Report-ILAE	CIRNAC, February 2023
240528 2AM-DOH1335 2024-KIT-JKM01-2AM-DOH1335 Inspection Report-ILAE	CIRNAC, April 2024
250331 2AM-DOH 2BE-HOP, 2BB-MAE, 2BB-BOS, 2AM-BOS_AgnicoEagle2024HopeBayAnnualRpt-NWB-ILAE	Agnico Eagle Mines Limited, March 2025
250331 2AM-DOH, 2BE-HOP, 2BB-MAE, 2BB-BOS, 2AM-BOS_AgnicoEagle2024HopeBayAnnualRpt-NWB_AppI.1_Site-WideAGI-ILAE	Agnico Eagle Mines Limited, March 2025
250331 2AM-DOH, 2BE-HOP, 2BB-MAE, 2BB-BOS, 2AM-BOS_AgnicoEagle2024HopeBayAnnualRpt-NWB_AppI.2_DorisTIA-AGI-ILAE	Agnico Eagle Mines Limited, March 2025

RESULTS OF REVIEW / INFORMATION REQUESTS

1. Quantity of Water Involved

Comment:

Section 2-1 of the document "260130 2AM-DOH1335_HopeBay-WLAmendment-App1-B-SIG" (henceforth: SIG) requires applicants to complete and submit a Water License Amendment Form. The application form provided by the Applicant did not include all the requested information.

Box 13 of the document "260130 2AM-DOH1335_HopeBay-WLAmendment-ApplicationForm-IMLE" (henceforth: Application Form) asks the Applicant to provide information related to water usage. Several of the questions within this section were not answered, or were only partially answered. The following information was not provided:

a. A description of the quality of the water source(s) and the available capacity(s).
b. The estimated quantity(s) of water to be used from each source in cubic metres per day (section 6-7 of the SIG).
c. A description of the estimated quantities to be used for each purpose (camp, drilling, etc.).
d. A description of the method(s) of extraction.
e. A consistent estimation of the quantity of water to be returned to source. The application states daily discharge will vary between 3,485 m^3/day to 8,769 m^3/day throughout the life of mine, but then references section 5.2 of Appendix 4-F. The listed values do not match the values provided in Table 5-2 or Table 5-3 of Appendix 4-F.

CIRNAC is concerned that without accurate information on water sources and extraction, the potential effects of the project on nearby freshwater cannot be evaluated.

Recommendation:

(IR-01): CIRNAC recommends that the Applicant amend and resubmit the Application Form to include:

IR-01a) A description of the quality of water source(s) and the available capacity(s).
IR-01b) The estimated quantity(s) of water to be used from each source in cubic meters per day.
IR-01c) The estimated quantities to be used for each purpose (camp, drilling, etc.).
IR-01d) A description of the method(s) of extraction.
IR-01e) An accurate estimation of quantity(s) of water returned to source(s) including proposed changes.

2. Detailed Site Maps

Comment:

a) Section 3-7 of the SIG (Supplemental Information Guidelines) required the Applicant to provide a map at a 1:50,000 scale based on the National Topographic Series indicating the location of the undertaking, watercourses and the location of waste deposits.

The maps provided to meet this requirement were shown at a 1:250,000 scale and a 1:340,000 scale, respectively. These maps only showed basic outlines of site and infrastructure, did not label the surrounding water courses, and did not show the locations of waste deposits. CIRNAC was unable to locate a map in any of the other documents that meet the listed requirements.

b) Section 4.1 requires the Applicant to provide maps and/or aerial photos of all project infrastructure (see the listed infrastructure in section 4.1a-4.1y of the SIG) for the Local Project Area (LPA) and/or the Regional Project Area (RPA). The maps or photos should allow the determination of distances between objects depicted and differentiation of any temporary components.

Most of the sections indicated by the Applicant to meet this requirement did not contain any maps. The most detailed maps were found on pages 9 and 10 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App4-F_WBWQM-OperationalUpdate” (henceforth: Water and Load Balance Model), but even these maps were not detailed enough to distinguish between all infrastructure and lacked some of the necessary components (e.g. raw water intake). CIRNAC was unable to locate a map or collection of maps that provided the requested information in section 4.1a through 4.1y of the SIG.

CIRNAC is concerned that without a thorough understanding of the overall site layout, it cannot accurately assess the effects of the project and proposed amendments.

Recommendation

IR-02a) CIRNAC recommends that the Applicant provide a map at a 1:50,000 scale based on the National Topographic Series indicating the location of the undertaking, watercourses and the location of waste deposits.

IR-02b) CIRNAC recommends that the Applicant provide a map or image (or a series of maps or images) that show and label all of the components listed in section 4.1a through 4.1y of the SIG. CIRNAC recommends that the map(s) be created at a scale such that the distance between objects can be determined, and that any temporary or proposed components are differentiated from permanent existing components.

3. Items Listed as NA

Comment:
The Applicant has answered numerous requirements of the SIG with “NA” and justified this response by either “No change from current Licence”, “Current practices will be applied” or “No change from current Annual Reporting”. CIRNAC notes that this is an application for a license renewal, not just a license amendment, and therefore all parts of the project are subject to review.

Recommendation:
IR-03) CIRNAC recommends updating and resubmitting the SIG to change all instances where the response has been listed as “NA” with the justification of “No change from current Licence”, “Current practices will be applied” or “No change from current Annual Reporting”. If the Applicant maintains that the requirement is not applicable, CIRNAC recommends providing justification of how it does not apply to the project. Otherwise, CIRNAC recommends providing the requested information to allow the application to proceed.

4. Missing Documents

Comment:
In the SIG, the Applicant has referenced multiple documents, including the Madrid-Boston Project Final Environmental Impact Statement (FEIS) and previous Annual Reports, that were not provided as a part of the application package. CIRNAC is of the opinion that all documents required to properly assess a renewal and amendment application should be submitted as part of the application process, since this ensures all parties are referencing the same document version.

Recommendation:
IR-04) CIRNAC recommends submitting all documents referenced in the SIG table that were not provided in the original application package.

5. Design Assumptions and Limitations

Comment:
As a part of the amendment and renewal application, the Applicant has provided design reports for Saline Water Pond 1, CWP 4 and Sump 6A.

Section 3-53b of the SIG requires the Applicant to provide a list of studies, reports and plans undertaken to date including any “design assumptions and the limitations

associated with such design assumptions". CIRNAC was unable to locate any discussion on design assumptions and associated limitations for Saline Water Pond 1, CWP 4, and Sump 6A.

CIRNAC is concerned that the design may include important assumptions and limitations that have not been discussed, and therefore cannot be reviewed.

Recommendation:
IR-05) CIRNAC recommends the Applicant describe what assumptions and limitations, if any, were used to design Saline Water Pond 1, CWP 4, and Sump 6A.

6. Annual Reporting Template

Comment:
Section 3-59 of the SIG requires the Applicant to provide "detailed information regarding the content of annual reports and a proposed outline or template of the annual report [including] the following:

a. Water related monitoring results
b. Comparison of water quality and quantity monitoring data with the water quality and quantity predictions presented in the application
c. A description of how conditions in the NIRB project certificate related to the NWB mandate have been implemented
d. Project changes under adaptive management
e. Any actions taken in response to direction provided by the Inspector"

CIRNAC did not find any proposed outline or template for annual reports within the application package. In reviewing the 2024 Annual Report, CIRNAC did not locate a section dedicated to meeting requirement 59c.

Recommendation:
IR-06) CIRNAC recommends that the Applicant provide a template for future annual reports, including sections to address:

a. Water related monitoring results
b. Comparison of water quality and quantity monitoring data with the water quality and quantity predictions presented in the application
c. A description of how conditions in the NIRB project certificate related to the NWB mandate have been implemented
d. Project changes under adaptive management
e. Any actions taken in response to direction provided by the Inspector

7. Compliance Assessment

Comment:

Section 3-61 of the SIG requires Applicants requesting a renewal or amendment of an existing licence to provide “a compliance/assessment/status report. This report must document the status of compliance for each condition of the existing water licence taking into consideration inspector dialogues and inspector directions, responses to inspector dialogues and inspector directions, spills that may have occurred, and any reporting requirements. The report must indicate when facilities were inspected by regulatory agencies and list any spills that may have occurred including a description, location shown on a map, and the action taken to address the affected area.”

Section 2.3 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-MainApplicationDocument-IMLE” (henceforth: Main Application) states that the Applicant complies with all items of the annual report and has not identified any non-compliances. However, inspection reports from 2022, 2023 and 2024 all indicate multiple non-compliances, some of which have been repeatedly noted (e.g. hazardous waste stored outside of secondary containment).

The Applicant refers to annual reports for information on inspections and follow-up action. The annual report contains a list of spills including a description and follow up action taken. However, it does not contain the location of spills on a map.

The concern is that the provided compliance assessment is inaccurate based on inspection reports, and cannot be used to effectively evaluate the Applicant’s compliance with its existing license.

Recommendation:

IR-07) CIRNAC recommends that the Applicant provide a complete compliance assessment which accurately details the status of compliance for each condition of the existing water license, taking into consideration inspector dialogues and inspector directions, responses to inspector dialogues and inspector directions, spills that may have occurred, and any reporting requirements. CIRNAC recommends that this compliance assessment also include an overview of all inspections and spills, including location on a map, that have occurred since the last license amendment.

8. Drainage Pathways

Comment:

CIRNAC notes the following missing information related to drainage pathways and water regimes:

a. No outline of the drainage basin and drainage patterns within the RPA were provided (Required by Section 4-1c of the SIG).
b. No outline of the drainage basin and drainage patterns within the LPA were provided (Required by Section 5-4 of the SIG).
c. The drainage patterns within the solid waste disposal areas were not provided (Required by Section 4-1j of the SIG).

CIRNAC cannot assess whether the proposed water management strategies are sufficient without an adequate description of the drainage patterns within the LPA and RPA, and maps showing how the water management infrastructure will affect the flow paths.

Recommendation:

IR-08a) CIRNAC recommends the Applicant provide an outline of the drainage basin and drainage patterns within the RPA.

IR-08b) CIRNAC recommends the Applicant provide an outline of the drainage basin and drainage patterns within the LPA, including the existing and proposed water management infrastructure.

IR-08c) CIRNAC recommends the Applicant provide a detailed depiction of the drainage patterns within the solid waste disposal area(s).

9. Geology and Minerology

Comment:

Section 4-2a of the SIG requires Applicants to provide a description of the location, physical nature, geology and minerology of the ore deposit and host rock. The documents “260130 2AM-DOH1335_HopeBay-WLAmendment-App4-A_GeochemCharacterizationNaartokWest” and “260130 2AM-DOH1335_HopeBay-WLAmendment-App4-E_InterimSourceTermReport” provide a comprehensive overview of the geology and minerology at the Madrid, Patch and Doris deposits, but are missing a few key details. CIRNAC notes the following missing information:

a. Arsenopyrite was listed as trace for Madrid and Patch deposits, but was not discussed for Doris (as required by section 5-23 of the SIG).
b. The document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-L_QuarryMgmtPlan_Jan2026_V8” (henceforth: Quarry Management Plan)

provides a summary of which quarries have undergone geochemical tests and the results of the tests. However, a summary of what tests and methods were used at each quarry site was not provided (as required by section 5-24 of the SIG).

Recommendation:

IR-09a) CIRNAC recommends that the Applicant verify whether Arsenopyrite present at the Doris deposit, and if so, provide the percentage.

IR-09b) CIRNAC recommends that the Applicant update Table 1.1 of the Quarry Management Plan to indicate which test methods were performed for each quarry.

10. Milling Plant Operations

Comment:

Section 4-2e of the SIG requires Applicants to provide information on the milling or processing plant. The Applicant has provided a copy of the mill flow sheet, including the points where reagents are added and the mill's capacity (8,000 tpd). However, they have not indicated whether the processing plan will be operating at its capacity and not indicated which reagents are being used throughout the process.

Recommendation:

IR-10a) CIRNAC recommends that the Applicant indicate the intended production rate of the mill

IR-10b) CIRNAC recommends specifying which reagents are being added at each step of the mill flow sheet.

11. Camp and Mine Site Population Projections

Comment:

Section 4-2g of the SIG requires the Applicant to provide a projected population size at the camp and mine site for each phase of the project. The Applicant has indicated that as part of the operational update, Doris camp will house up 800 people. A smaller camp at Madrid may be constructed to accommodate 250 people, or the Doris camp will be expanded to accommodate 1050 people.

CIRNAC was unable to locate the projected camp and mine site population projections for the other phases of the project.

Recommendation:
IR-11) CIRNAC recommends that the Applicant estimate the camp and mine site population projections for all phases of the project and provide these estimates based on the proposed construction schedule from opening through construction and finally into commercial production.

12. Predicted Climate Trends

Comment:
Section 5-3 of the SIG requires Applicants to provide a description of the site conditions, including predicted future climate trends.

The Applicant provided a description of current climate conditions within the document Water and Load Balance Model, but did not provide a description of predicted future climate trends.

The Applicant's long-term waste and water management plans involve allowing tailings and potentially acid generating waste rock to freeze within permafrost. This plan relies on these areas remaining frozen indefinitely in order to prevent groundwater and runoff contamination.

CIRNAC is concerned that without site specific future climate trends, it cannot accurately assess the viability of the Applicant's long-term water management strategy, waste management strategy or closure predictions included in any ICRP or FCP.

Recommendation:
IR-12) CIRNAC recommends that the Applicant provide a description of the predicted future climate trends at the project site. CIRNAC recommends that all projections include worst-case scenario projections using the Intergovernmental Panel on Climate Change's Shared Socioeconomic Pathway – Representative Concentration Pathway 5-8.5.

13. Information on Affected Water Courses

Comment:
Section 1.5.4 of the Volume 5-1 of the Final Environmental Impact Statement (document 171221-12MN001-Volume 5 Section 01. Surface Hydrology-IMTE) indicates that the project may result in the alteration of streamflow in the Doris, Windy and Aimaokatalok watersheds.

The following water courses are projected to be affected in the Doris Watershed: Wolverine Lake Outflow, Patch Lake Outflow, PO Lake Outflow, Ogama Lake Outflow, Doris Lake Outflow, and Little Roberts Outflow.

The following water courses are projected to be affected in the Windy Watershed: Windy Lake Outflow and Glenn Lake Outflow

The following water courses are projected to be affected in the Aimaokatalok Watershed: Trout Lake Outflow, Stickleback Lake Outflow, Aimaokatalok Outflow, Koignuk River 1 and Koignuk River 2.

Section 5-9 of the SIG requires the Applicant to indicate the slope of the banks of any water course affected by the application, and section 5-10 of the SIG requires that the Applicant provide a description of the meander pattern for any channel affected by the application.

CIRNAC was unable to locate any information on the bank slopes or meander patterns for the listed affected streams.

Recommendation:

IR-13) CIRNAC recommends that the Applicant indicate the slope of the banks and the meander pattern for the water courses affected by this application.

14. Watercourse Flow Rates

Comment:

Section 5-11 of the SIG requires Applicants to provide the following streamflow data in cubic metres per second for each watercourse included in the application: mean annual flow, mean summer flow, minimum summer flow, minimum annual flow, mean annual flood, maximum summer flood, and mean summer flood.

The document “260130 2AM-DOH1335_HopeBay-WLAmendment-App4-C_AnalysisIncreasedWaterWithdrawals” contains the mean annual flow, and sufficient information to calculate the mean summer flow, minimum summer flow, and minimum annual flow for Doris Lake outflow, Patch Lake outflow, and Windy Lake outflow, but does not include any of the other required statistics.

CIRNAC is concerned that it cannot adequately evaluate all potential effects of increased water withdrawals without the referenced baseline data.

Recommendation:
IR-14) CIRNAC recommends the Applicant provide the mean annual flood, maximum summer flood and mean summer flood in cubic metres per second for Doris Lake outflow, Patch Lake outflow, and Windy Lake outflow.

15. Source Water Quality

Comment:
Section 6-5 of the SIG requires Applicants to provide a description of the quality of the water from the source(s) for each season (summer, fall, winter, spring). The Applicant referenced Appendix D of the Water and Load Balance Model to meet this requirement. However, Appendix D provides calculated end-of-pipe water quality results, not a description of source water quality. Appendix B provides background water chemistry averaged from Tail Lake and Doris Lake, but does not provide information on Patch Lake, Windy Lake, or Doris Lake by itself.

CIRNAC is concerned that it cannot evaluate the project's effects on water quality without baseline source water quality data.

Recommendation:
IR-15) CIRNAC recommends that the Applicant provide a description of the quality of the water from each of Windy Lake, Patch Lake, and Doris Lake for each season (summer, fall winter, spring).

16. Water Intake Pump

Comment:
Section 6-8 of the SIG requires Applicants to provide a description of the water intake method including the intake facility, the operating capacity of the pump used, the details of any screening to exclude fish, and the distance the pump will be placed from the ordinary high water mark of the watercourse.

Section 6-9 of the SIG requires Applicants to provide a description of the general condition of any existing water intake facility, and rate the condition of the facility as satisfactory or unsatisfactory and explain the rating.

CIRNAC found indication that the new Windy Lake intake pipeline will be installed with a fish screen in Section 3.2.10 of the document "260130 2AM-DOH1335_HopeBayWL Amendment-App6-P_Doris-MadridWaterMgmtPlan_Jan2026_V20" (henceforth: Water Management Plan), but was unable to locate any of the other requested information.

Recommendation:

IR-16) CIRNAC recommends that the Applicant provide the following information:

IR-16a) A description of the operating capacity of the pump(s) used.
IR-16b) The distance between the pump(s) and the ordinary high water mark of the watercourse.
IR-16c) A description of the condition of any existing water intake facilities, and a rating of the facility as satisfactory or unsatisfactory with an explanation of the rating.

17. Water Management Plan

Comment:

Information on water management for the project is provided via text in the Water Management Plan and summarized within Figure 1: Water Management Flow Diagram-Doris and Madrid. However, CIRNAC noted numerous areas where the text and the flow diagram appear to contradict each other. Of note:

a. Section 3.1.3.1 indicates that mine water from Doris mine with be treated and discharged to Roberts Bay, either directly, or via Saline Pond 2. However, the flow diagram shows mine water pumped to Saline Pond 1, not Saline Pond 2.
b. Section 3.1.4 indicates that process water is sourced from Doris Lake and the reclaim pond. However, the flow diagram shows process water flowing from the Doris Process Plant towards the TIA.
c. Section 3.2.3.1 indicates that CWP 2 will be pumped directly to the TIA, but the flow diagram shows water from CWP 2 flowing into the Doris Sediment Control Pond.
d. Section 3.2.5 indicates that Sump 1 is constructed downstream of the Sedimentation CWP 1, however the flow diagram shows Sump receiving seepage from rock pads and ore pads then pumping water into CWP 1.
e. Section 3.2.6.1 indicates that process water in excess of what is recycled in the Doris process plan will flow into the TIA. However, the flow diagram shows process water flowing from the TIA to the Doris Process Plant.
f. Section 3.2.8.1 indicates than non-compliant quarry water would be transported to the TIA, but the flow diagram shows quarry water being directed to the Doris Sediment Control Pond.
g. Section 3.2.11 indicates that details on the landfarm can be found within the *Hydrocarbon Contaminated Material Management Plan*. The document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-G_Hydrocarbon ContamMatMgmtPlan_Nov2025_V5” indicates that water from the landfarm that does not meet tundra discharge criteria will be transported to the TIA. However,

the flow diagram shows water from ancillary facilities being transported to the Doris Sediment Control Pond.

h. Section 4.1.3 indicates that the Madrid North mine will intercept talik below Patch, Windy and Imniagut Lakes and mining at Madrid South is expected to intercept the talik below Wolverine and Patch Lakes. However, the flow process diagram only shows potential drawdown through taliks from Patch, Imniagut and Wolverine Lakes into the Madrid Mine (i.e., it does not include drawdown from Windy Lake)
i. Section 4.1.5 indicates that there will not be a camp at the Madrid North or South sites, and sewage water will be trucked to Doris Site sewage treatment facility. However, the flow diagram indicates flow of treated water to Madrid Camp and subsequently to a Sewage Treatment Plant. Additionally, the Applicant has indicated in the Main Application Document that a camp may be constructed at Madrid to accommodate up to 250 people.
j. Table 4-1 indicates that the Madrid North Ore Stockpile reports to Sump 1, but the flow diagram indicates that the water from the Madrid North Ore Pad reports to Sump 3.
k. Table 4-1 indicates that the Madrid North Waste Rock Pile reports to Sump 1, but the flow diagram indicates that it reports to Sump 5.
l. Table 4-1 indicates that the Madrid South Waste Rock Pile reports to the Madrid South Primary CWP, but the flow diagram indicates that it reports to Madrid Sump 1.
m. Table 4-1 indicates that the Patch CWP 4 reports to the Quarry D CWP 3, but the flow diagram indicates that it flows directly to the TIA.
n. Several elements within the Flow diagram are not referenced in the rest of the document, including the Madrid S Infrastructure Pad, CWP 6, Patch 7 Infrastructure Pad, Patch 7 Ore Pad, Patch 7 Waste Rock Pad, the existing Madrid N Overburden Pad, the proposed Madrid N Overburden Pad, Madrid Sump 4, Naartok W Infrastructure Pad, Naartok E Infrastructure Pad, and Madrid Sump 2

The concern is the CIRNAC cannot adequately assess the site's water management plan if the water management processes are not documented consistently and accurately.

Recommendation:

IR-17) CIRNAC recommends that the Applicant provide an updated water management plan that demonstrates consistency between the text and its flow diagram. CIRNAC recommends using the same names for facilities between the text and the flow diagram to ensure comparability.

18. Ice Road Construction

Comment:

Section 6-14 of the SIG asks Applicants to indicate the quantities of water required for ice road construction and provide a description of the methods of ice road construction. The Applicant has referred to block 13 of the Application Form to answer this question, but this section does not contain any reference to an ice road.

Section 3.3.8.1 of the Main Application indicates that the Applicant will use water from proximal sources to construct a winter ice road. No other information regarding the quantity of water required for ice road construction or the methods of ice road construction were found within the application package.

Recommendation:

IR-18) CIRNAC recommends that the Applicant clarify whether or not they intend to build ice roads as a part of this project. If so, CIRNAC recommends that the Applicant indicate the quantities of water required for ice road construction and provide a description of the methods of ice road construction, monitoring and safety.

19. Water Storage Facilities

Comment:

CIRNAC noted a lack of information regarding existing water storage facilities. Since this is a renewal application and not just an amendment, information on all facilities should be provided. Of note:

a. Section 6-16 of the SIG requires Applicants to provide the water storage volume in cubic metres. CIRNAC was only able to locate the water storage volumes for the proposed Saline Pond 1 and CWP 4.
b. Section 6-17 of the SIG requires Applicants to indicate whether reservoirs are lined, the type of liner and when it was or will be installed. The design reports indicate that the new Saline Pond 1, CWP 4, and Sump 6A will be lined, including the type of liner. The Water Management Plan indicates the Doris Sedimentation Pond is lined, but does not indicate the type of liner or when it was installed. CIRNAC was unable to locate any other information regarding whether or not existing reservoirs are lined, what type of liner they contain, and when those liners were installed.
c. Section 6-18 of the SIG requires Applicants to indicate whether a storage reservoir is created in a natural channel. If applicable, it requires Applicants to provide plan and profile drawings of the reservoir including the size of the drainage basin upstream of the reservoir, topographical plan showing the drainage area boundary, number of hectares flooded, surface area of the

reservoir at full capacity, storage capacity, and details of shoreline protection. Section 3.4 of the design reports for CWP4 and Saline Pond 1 indicate that they will be built within a natural drainage basin, but they do not indicate the drainage area boundary, the number of hectares flooded, the surface area of the reservoir at full capacity, or details of shoreline protection. None of the required information was provided for the other storage reservoirs at the project site.

d. Section 6-19 requires Applicants to provide a plan showing representative cross sections of the reservoir. CIRNAC found cross sections for the proposed CWP4 and Saline Pond 1, but not for any of the existing reservoirs.

Recommendation:

CIRNAC recommends that the Applicant provide the following information for all water reservoirs that are part of the project:

IR-19a) The water storage volume in cubic metres.

IR-19b) An indication of whether reservoirs are lined, the type of liner and when it was or will be installed.

IR-19c) An indication of whether existing storage reservoirs are in a natural channel. If applicable, provide plan and profile drawings of the reservoir including the size of the drainage basin upstream of the reservoir, topographical plan showing the drainage area boundary, number of hectares flooded, surface area of the reservoir at full capacity, storage capacity, and details of shoreline protection.

IR-19d) A plan showing representative cross sections of the reservoir.

20. Water Distribution

Comment:

Section 6-22 of the SIG requires Applicants to provide a description of the general condition of any existing distribution system and provide an explanation if it is unsatisfactory. CIRNAC was able to find an assessment of the Doris TIA pipelines within the document “250331 2AM-DOH, 2BE-HOP, 2BB-MAE, 2BB-BOS, 2AM-BOS_AgnicoEagle2024HopeBayAnnualRpt-NWB_AppI.2_DorisTIA-AGI-ILAE”, but was not able to find assessments of any other pipelines within the project.

Recommendation:

IR-20) CIRNAC recommends the Applicant provide a description of the general condition of all existing distribution systems and provide an explanation if it is unsatisfactory.

21. Watercourse Crossings

Comment:

Section 6-23 of the SIG requires Applicants to provide a description of any water course crossings including pipelines, bridges, culverts or roads and its purpose.

Section 6-24 requires Applicants to provide a plan of any watercourse crossing showing cross section and elevations.

CIRNAC noted multiple watercourse crossings within the project, but was not able to locate any detailed information or cross sections of watercourse crossings within the application package.

Recommendation:

IR-21) CIRNAC recommends that the Applicant provide a description of all watercourse crossings including pipelines, bridges, culverts or roads. CIRNAC recommends that the description include the water crossing's purpose and a cross section of the crossing including elevations.

22. Watercourse Trainings

Comment:

Section 6-25 of the SIG requires Applicants to provide a description of any watercourse trainings including channel and bank alterations, culverts, spurs, erosion control, and artificial accretion, and its purpose. The Applicant indicated this section as Not Applicable, with the justification that there is no change from the current license. CIRNAC notes that this is a renewal application, not an amendment, so all aspects of the project should be reviewed.

Recommendation:

IR-22) CIRNAC recommends that the Applicant provide a description of any watercourse trainings including channel and bank alterations, culverts, spurs, erosion control, and artificial accretion, and its purpose.

23. Water Diversions

Comment:

Section 6-27 of the SIG requires Applicants to provide a description of any diversions including ditches and dikes and their purposes. The Applicant indicated this section as Not Applicable, with the justification that there is no change from the current license.

CIRNAC notes that this is a renewal application, not an amendment, so all aspects of the project are subject to review.

Recommendation:
IR-23) CIRNAC recommends that the Applicant provide a description of any diversions including ditches and dikes and their purposes.

24. Operations and Maintenance Plans

Comment:
Section 6-46g of the SIG requires Applicants to provide all plans relevant to the application, including operation and maintenance plans. The Applicant provided an operations and maintenance plan for the Doris TIA, but not for other important parts of the project.

Recommendation:
IR-24) CIRNAC recommends providing operation and maintenance plans for all major infrastructure associated with the project, including but not limited to the Milling and Processing Plant, the RBDS Pumphouse, the Effluent Water Treatment Facility, the Landfarm, the Sewage Processing Plant, the Landfill, Doris Mine and Madrid Mine.

25. Waste Generation: Quality and Quantity

Comment:
Section 7-2 of the SIG requires Applicants to provide the composition, chemical characteristics and quantity generated for each type of waste. CIRNAC noted the following missing information for the various waste streams:

a. Sewage: CIRNAC did not locate any information on the quantity of sewage generated.
b. Greywater: CIRNAC did not locate any information on quantity of greywater generated.
c. Non-hazardous solid waste: Table 4.1 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-J_Non-hazardousWasteMgmtPlan_Jan2025_V2” (henceforth: Non-Hazardous Waste Plan) provides the various types of non-hazardous waste, but does not provide an estimate of the quantity generated.
d. Sludge: CIRNAC did not locate any information on the chemical characteristics or the quantity of sludge generated.
e. Hazardous waste: Table 4.1 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-F_HazardousWasteMgmtPlan_Jan2026_V8” (henceforth:

Hazardous Waste Plan) provides the various types of hazardous waste, but does not provide the chemical characteristics or an estimate of the quantity generated.

f. Contaminated soil, snow, ice and/or water: this category is include in table 4.1 of the Hazardous Waste Plan, but CIRNAC did not locate an estimate of the quantity generated.
g. Bulky items and scrap metal: this category is include in table 4.1 of the Non-Hazardous Waste Plan, but CIRNAC did not locate any information on chemical characteristics or an estimate of the quantity generated.

Recommendation:
IR-25) CIRNAC recommends that the Applicant provide the composition, chemical characteristics and quantity generated for all waste types produced as a part of this project. CIRNAC requests that these quantities take into account the projected increase in camp production and personnel under the Construction and Operational Phases.

26. Sewage Processing Capacity

Comment:
Section A2.1 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-B_DomesticWastewaterTreatmentPlan_Jan2026_V9” indicates that the Doris Camp has two modular Sanitherm membrane biological reactor, and each plant has the capacity to manage the average waste volume generated by 150 people.

Section 3.3.14 of the Main Application indicates that the operational capacity of Doris Camp is planned to increase to between 800 and 1050. Additionally, a smaller camp with a capacity of 250 may be built at Madrid.

CIRNAC did not find any information indicating plans to build more sewage treatment facilities. CIRNAC is concerned that the site will not have the capacity to accommodate the increased camp population, potentially leading to greywater and/or sewage pollution.

Recommendation:
IR-26) CIRNAC recommends the Applicant detail how it plans to accommodate the increased sewage and greywater treatment demands associated with increasing camp size.

27. Tailings Alternatives Assessment

Comment:
Section 7-9 of the SIG requires Applicants to provide an assessment of alternatives for any proposed tailings containment facility. The document “260130 2AM-DOH1335_ HopeBay-WLAmendment-App3-A_TIAFilteredTailingsPermittingConcepDesign” indicates that a Multiple Accounts Analysis was conducted by SRK in 2024, but this study has not been provided in the application package.

Recommendation:
IR-27) CIRNAC recommends that the Applicant provide the 2024 Multiple Accounts Analysis by SRK as a part of the amended application package.

28. Discharge Criteria Rationale

Comment:
Section 7-12 of the SIG requires Applicants to clearly outline the proposed discharge criteria, how the criteria were developed, standards to be applied, and how these criteria will be used to prevent negative effects in the receiving environment.

Discharge criteria for the Sewage Treatment Plant, the CWPs sumps, the Landfill sumps, the Landfarm Sump, and the Fuel storage and Containment Facility Sumps are listed within License 2AM-DOH1335. However, CIRNAC was unable to locate any information in the application package regarding how these criteria were developed and how these criteria will be used to prevent ecological effects in the receiving environment.

Recommendation:
IR-28) CIRNAC recommends that the Applicant provide rationale for all discharge criteria applicable to the current license, including a description of how they were developed, what reference material was used in the development of the discharge criteria and how they will prevent negative effects to the receiving environment.

29. Emergency Response and Spill Contingency Plans

Comment:
Section 7-22 of the SIG requires Applicants to ensure plan(s) address all phases of the project including construction, operation, and care & maintenance.

Section 1 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-M_SpillContingencyPlan_V19_Jan2026” (henceforth: Spill Contingency Plan) indicates

that the plan has been revised to reflect Care and Maintenance operations, and will be revised as required prior to returning to the Operations phase.

The Dam Emergency Plan is found in Appendix F of the document “260130 2AM-DOH1335_HopeBayWLAmendment-App6-N_DorisTIAOMSManual_Jan 2026_V9”. Section 1 of this document indicates that the current version reflects the current Care & Maintenance Phase for Hope Bay.

The document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-C_ERP_Jan2026_V7” (henceforth: Emergency Response Plan) does not appear to indicate whether which project phase it is intended to address.

The project is currently in Care & Maintenance, but the Applicant is proposing to re-enter Construction from 2027 to 2029, then conduct Operations from 2030 to 2043. CIRNAC is concerned that the plans will not be updated and submitted for review before the changes in operational phases.

Recommendation:
IR-29) CIRNAC recommends the Applicant amend The Spill Contingency Plan, the Dam Emergency Plan, and the Emergency Response Plan to address all phases of the project including construction, operation, and care & maintenance.

30. Permafrost Protection

Comment:
Section 7-24e of the SIG requires Applicants to provide a list of studies, reports and plans relevant to the application, including permafrost protection. The Applicant responded to the requirement with “NA”, and the justification that there is “No change from current License”. CIRNAC was unable to find information within the application package related to permafrost protection, and notes that since this is a renewal application, all relevant information should be provided.

Recommendation:
IR-30) CIRNAC recommends the Applicant provide information on how they will protect permafrost at the site throughout the continued duration of the project.

31. Sampling Personnel

Comment:
Section 8-2 of the SIG requires Applicants to indicate who is responsible for sampling including that person's position, contact information and level of training. CIRNAC was able to locate the following information:

a. The environmental supervisor and consultants are responsible for conducting AEMP sampling.
b. The environmental superintendent is responsible for
   - Collecting water quality samples from sumps, backfilled stopes and the Water Treatment Plant during periods of discharge.
   - Conducting or facilitating the seep sampling program.
   - Monitoring water quality in the ponds, TIA and discharge points.

CIRNAC was unable to locate the contact information or level of training for the environmental supervisor or environmental superintendent.

Recommendation:
IR-31) CIRNAC recommends providing the contact information and level of training for the environmental supervisor, the environmental superintendent, and any other personnel responsible for sampling.

32. Laboratory Contact Information

Comment:
Section 8-3 of the SIG requires Applicants to indicate the name and contact information of the certified laboratory performing the analysis of samples. CIRNAC was unable to locate the lab contact information within the application package.

Recommendation:
IR-32) CIRNAC recommends the Applicant update the document "260130 2AM-DOH1335_HopeBay-WLAmendment-App6-K_QAQCPlan_Nov2025_V15" to include the contact information for the certified laboratories.

33. Expected Water Quality and Quantity

Comment:
Section 8-6 of the SIG requires Applicants to provide a summary table of the expected quality and quantity of waters, over time in all sumps, monitoring stations, and discharge points, along with i) if applicable, adaptive management criteria to benchmark if

mitigation/contingency are to be implemented, ii) if applicable, water quality criteria, and iii) management action.

The Water and Load Balance Model provides expected end-of-pipe water quality and quantity into Roberts Bay, and the Water Management Plan provides discharge criteria for tundra discharges. CIRNAC was unable to locate information on the expected quantity of water over time at tundra discharge points. CIRNAC was also unable to locate a summary of expected quality and quantity of waters over time in sumps or monitoring stations.

CIRNAC is concerned that without water quality and quantity estimates, adaptive management criteria and water quality criteria, the Applicant will not catch early warning signs of water management issues.

Recommendation:
IR-33) CIRNAC recommends that the Applicant provide a summary table of the expected quality and quantity of waters, over time in all sumps, monitoring stations, and discharge points (including tundra discharge points), along with i) if applicable, adaptive management criteria to benchmark if mitigation/contingency are to be implemented, ii) if applicable, water quality criteria, and iii) management action.

34. Proposed Water Works

Comment:
The Applicant has provided two design reports as a part of the renewal and amendment application: one for CWP 4 and another for Saline Pond 1. Section 6a-35 of the SIG requires Applicants to provide detailed design plans for all proposed water works, and includes a list of design plan requirements. The Applicant has provided design reports for both proposed works, but CIRNAC notes the following missing information:

a. No explanation of the rationale for the selected design flow flood and its return period was provided for either design report (requirement 6a-35f)
b. The design reports do not include tentative start and completion dates for construction (requirement 6a-35j).
c. The sedimentation and erosion measures listed in section 5.2 of the water Management Plan lack specificity, and have not been applied to either design report (requirement 6a-35p).
d. No construction monitoring plans were included for either report (requirement 6a-35q).
e. Post construction monitoring plans have not been provided (requirement 6a-35x).

Recommendation:

IR-34a) CIRNAC recommends that the Applicant provide rationale for the design flow flood chosen.

IR-34b) CIRNAC recommends the Applicant indicate a tentative start and completion date for each proposed work.

IR-34c) CIRNAC recommends the Applicant provide detailed sedimentation and erosion measures to be used for each proposed work.

IR-34d) CIRNAC recommends the Applicant provide construction monitoring plans.

IR-34e) CIRNAC recommends the Applicant suggest post construction monitoring plans for each proposed work.

35. Saline Effluent Treatment Plant

Comment:

Section 4.4.1 of the Main Application indicates that the Applicant intends to build an updated and optimized water treatment plant to treat saline water. The application indicates that the upgraded Saline Effluent Treatment Plant will be contained within the existing water treatment footprint north of the TIA.

No other information was provided regarding construction timelines, the proposed treatment methods, or the proposed treatment goals for the Saline Effluent Treatment Plant.

Given the planned reopening and increased mining activity, it is unclear whether the existing saline water treatment system has sufficient capacity to operate in the interim, or whether the updated treatment plant is required prior to or concurrent with the restart of operations.

Recommendation:

IR-35a) CIRNAC recommends that the Applicant provide a description of the proposed Saline Effluent Treatment Plant including tentative construction timelines, the proposed treatment methods, and the proposed treatment goals.

IR-35b) CIRNAC recommends that the Applicant indicate whether the treatment plant will be finalized before the project re-enters its Operational Phase. If not, CIRNAC recommends that the Applicant indicate whether the current saline water treatment capacity is sufficient to manage the anticipated increase in saline water volumes during the planned Operational Phase and if not then what other options are being explored to meet requirements.

36. Blasting Quantities

Comments:

In the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App1-A-EvaluationofChange” (henceforth: Evaluation of Change), the Applicant indicates that the current blasting limits authorized for each site are as follows:

- Doris: 700,000 kg/year
- Madrid: 2,248,000 kg/year
- Boston: 1,685,00 kg/year
- Total: 4,633,000 kg/year

As a part of the operational update, the Applicant indicated that overall blasting will decrease to 3,650,000 kg/year across all three sites. There was no indication of how this quantity will be distributed between Doris, Madrid, and Boston. Boston is authorized under a separate water license (2AM-BOS1835), and therefore CIRNAC is concerned that it cannot adequately assess the proposed changes to license 2AM-DOH1335 without a further breakdown.

Recommendation:

IR-36) CIRNAC recommends that the Applicant indicate what proportion of the 3,650,000 kg/year of blasting will be conducted at the Madrid and Doris sites.

37. Water from Proximal Sources

Comment:

In the section 3.3.8.1 of the Main Application and Block 13 of the Application Form, the Applicant requests authorization to 60,000 m³/year of freshwater from “proximal sources” for activities such as winter ice road construction. However, the application does not specify which lakes or waterbodies constitute these proximal sources, nor indicate how the Applicant will ensure withdrawals do not negatively affect these water sources. CIRNAC is concerned that without specified guidelines and limitations, withdrawals from these proximal sources could result in negative environmental impacts.

Recommendation:

IR-37a) CIRNAC recommends that the Applicant provide a detailed list of proposed proximal sources, a map of the sources, and volume measurements of each source to ensure none of these sources are drawn down during periods of operation in winter conditions under ice.

IR-37b) CIRNAC recommends that the Applicant clarify what measures it will take to minimize the impacts of withdrawals from 'proximal sources' on water levels and flow rates.

38. Widening of Windy Road

Comment:

Section 1.2 of the Main Application indicates that the Applicant intends to widen the Windy Road to support mining from the Madrid area. However, the application package does not contain details on the new footprint/alignment or proximity to water bodies. The erosion and sediment control measures listed in section 5.2 of the Water Management Plan lack specificity, and have not been applied to the road construction work.

CIRNAC is concerned that it cannot adequately assess the proposed amendment to the road without more information on the planned expansion and environmental protection measures during construction.

Recommendation:

IR-38) CIRNAC recommends the Applicant provide the anticipated footprint and alignment for the widened Windy Road, and describe how they will prevent sedimentation and erosion during construction activities.

39. Quarry 2 Landfill

Comment:

Section 5.1 of the Non-Hazardous Waste Plan indicates plans to construct a landfill within Quarry 2 at Doris. This request was not included within the Evaluation of Change or the Main Application document.

Section 3.3.12.1 of the Main Application indicates that waste generated on-site will continue to be disposed of in the landfill located in Quarry 2. This implies that the landfill has already been built and is operational. CIRNAC was unable to locate construction notices or as-built construction plans for the landfill within the NWB registry.

CIRNAC is unclear as to whether the landfill at Quarry 2 was already built, or whether this is a part of the current amendment application.

Recommendation:

IR-39) CIRNAC recommends that the Applicant clarify whether the landfill at Quarry 2 is already operational, or whether it is being requested as part of the current renewal and amendment application. If it is part of the amendment request, CIRNAC recommends that Applicant provide:

- an anticipated construction timeline
- clarification on whether it is expected to be in service before the mine re-enters Operations.
- The necessary geotechnical information required to approve a Quarry for use as a landfill.

40. Wolverine Lake

Comment:

Section 4.2.8 of the Water Management Plan states that “Any make-up water required for industrial use at Madrid North will be pumped from Doris Lake, and freshwater may be pumped from Patch Lake or Wolverine Lake, as needed”. However, Wolverine Lake is not listed as a proposed water source within the Application Form or Main Application.

CIRNAC is concerned that the Applicant may plan to use water from a source that has not undergone proper assessment to determine potential impacts.

Recommendation:

IR-40) CIRNAC recommends the Applicant clarify whether or not they are applying to source water from Wolverine Lake under this Water License. If so, CIRNAC recommends the Applicant provide all the relevant supporting information, including the intended withdrawal volumes and hydrological information about Wolverine Lake.

41. Security

Comment:

Section 7 of the document “260130 2AM-DOH1335_HopeBay-WLAmendment-App6-I_Doris-Madrid ICRP-V8” states the following regarding security:

“Agnico Eagle recognizes a security update will be required for this Water Licence Amendment; however, an update has not been provided at this time. Based on

experience, Agnico Eagle appreciates the level of review and discussions on security that are required. Agnico Eagle will work with the KitIA and CIRNAC through the Water Licence Amendment process to review securities to be held under the 2AM-DOH Licence. An agreement with both parties will be in place prior to the Water Licence Final Hearing."

CIRNAC is seeking additional information regarding the timing of the security review.

Recommendation:

IR-41) CIRNAC recommends the Applicant provide an estimated timeline of when the security review will begin and when they anticipate it will be completed. It is CIRNAC's opinion that given the complexity of the file that initial discussions with the KIT IA and the proponent on the development of foundational agreements need to be initiated as soon as possible to ensure that the Environmental liability estimates and the global securities process is not holding up the any decisions by the Board on the recommendations to be made to the Minister.