



AGNICO EAGLE

April 24, 2026

Ali Shaikh
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0B 1J0

Re: Response to Second Round of Comments to 2AM-DOH1335 Water Licence Amendment – Operational Update – Information Requests / Completeness Check

Dear Mr. Shaikh,

In response to the second round of comments received on April 20, 2026 from the Nunavut Water Board (NWB) regarding the 2AM-DOH1335 Water Licence Amendment – Operational Update – Information Requests / Completeness Check, Agnico Eagle is pleased to provide the enclosed responses.

We would like to emphasize the following general themes, appreciating that some reviewers may be new to the NWB process:

- 1) It is important to focus our collective efforts on the most important issues in this Application. Agnico Eagle recommends that reviewers focus attention on the new or amended items which are described in the Application. It would not be efficient to focus attention and effort on existing and approved Project components and activities that are not changing, particularly given that no significant issues have been raised by reviewers during the annual reporting process for 2AM-DOH1335.
- 2) While Agnico Eagle is taking the opportunity to extend the term of the licence as part of the Operational Update process, an extension to the duration of a licence does not trigger the need to re-evaluate all licence terms as if it was a new application.
- 3) The focus of the NWB should continue to be on following the established procedural steps for an Amendment Application.
- 4) The SIG has been completed based on practical applicability to the new or amended items associated with the current Application. The SIG for this submission is consistent with the SIG accepted by the NWB in other Water Licence Amendment submissions.

- 5) Many specific requests appear to focus on the historical development of Licence terms. If individual reviewers require this information, it is provided on the [NWB public registry](#) in previous NWB Reasons for Decision on 2AM-DOH1335. Where such information has been requested, Agnico Eagle is making an effort to provide linkage and reference to historical documents for context only and to help the reviewers.
- 6) To avoid potential for confusion, Agnico Eagle generally suggest reviewers use terminology such as “evaluate” rather than “assess” in their comments on the Amendment Application and related documents (as the NWB is aware, the Hope Bay Mine received a positive environmental assessment determination from NIRB and the Minister based on previous FEIS and FEIS Addendum).

Agnico Eagle has provided responses to the outstanding comments received from the KitIA, DFO, and CIRNAC in the enclosed table. In our view, the information that has been provided to date is sufficient for the NWB to decide that the “information request” licensing stage is now complete, and that the file is now ready to move on to the “technical comment stage”. We encourage the NWB to move forward based on the details that have been provided in this submission and the April 9th submission.

Should you have any questions or require further information, please contact the undersigned at your convenience. We look forward to continuing to the next stage in the process.

Regards,



Colleen Prather

colleen.prather@agnicoeagle.com

Superintendent, Permitting & Regulatory Affairs

Unresolved Information Requests ^(a)	Response
KitIA-22	Agnico Eagle’s understanding is that while this is presented as an “IR”, no information is being specifically requested. Instead, Agnico Eagle has been asked to <i>“illustrate how fish pass ability/ movement considerations contributed directly to each life function in the HEP.”</i> This is a technical comment and Agnico Eagle can provide a technical response during the technical review stage. As KitIA-22 is more of a technical comment than information request, this item should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process.
KitIA-23	Information was provided; however, rather than providing more information in writing it seems that further discussion would be more productive to resolve the outstanding issue. Agnico Eagle suggests these discussions can be held bilaterally and formally as part of the NWB process if needed during the technical review stage. KitIA-23 should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process.
KitIA-24	KitIA has requested further information on species specific offsetting. However, per DFO policy offsetting measures do not focus on individual species. A recent example of offsetting measures which aligns with DFO policy is the Pistol Bay Falls offsetting program for the Meliadine Mine, where productivity gains related to Arctic Char will be used to offset losses related to multiple species in the Project vicinity. Agnico Eagle would not be in agreement with recommendations that focus on species specific offsetting rather than more general measures. KitIA-24 should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process, as it is primarily focused on items specific to the <i>Fisheries Act</i> and related policies. However, Agnico Eagle is open to discussing offsetting further as a general topic during the NWB technical review licensing stage.
DFO-4	Agnico Eagle suggests these discussions can be held bilaterally and formally as part of the NWB process if needed during the technical review stage. As DFO-4 is more of a technical comment than information request, this item should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process.
DFO-5	As acknowledged by DFO, marine shipping is outside the jurisdiction of the NWB. Agnico Eagle recommends speaking on this topic outside of the NWB process.
DFO-6	Agnico Eagle suggests these discussions can be held bilaterally and formally as part of the NWB process if needed during the technical review stage. As DFO-6 is more of a technical comment than information request, this item should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process.

Unresolved Information Requests^(a)	Response
CIRNAC-1a	<p>As noted in the cover memo, proponents are not required to “re-apply” for existing water licenses when applying for amendments to terms and conditions and extension of water licence dates.</p> <p>There are no changes to the items listed in Box 13 of the Application proposed in the Amendment Application. Information on the quality of water source and capacities are provided in Appendix 4-F of the Application.</p> <p>While it has only limited relevance to the Amendment Application, should the information be of assistance to the CIRNAC reviewer, background information for water quality has already been provided and is present on the NWB registry. Agnico Eagle also carries out monitoring in accordance with the water licence which appears on the public registry. Please refer to Annual Reports (Section 4, Appendix D) and Monthly Reports (as per Item 112 of the WL). Providing separately during this process adds unnecessary duplication.</p> <p>Should the CIRNAC reviewer be interested in additional background information on these topics we refer you to the previous FEIS and FEIS Addendum for the Doris North and Hope Bay Belt Projects, which was accepted by the NIRB and used as a foundation for the Project Certificate and Type A Water Licence.</p>
1b	<p>As background, Agnico Eagle respects DFO 10% guidance for withdrawing water from sources.</p> <p>To address CIRNAC’s comment, Agnico Eagle estimates withdrawal will be similar per year, as is currently experienced at the project, so there is no need to re-evaluate these items as suggested in CIRNAC’s comment. By following the established license terms and conditions and NWB approved plans, water balances in the individual water bodies will continue to be protected.</p> <p>As currently, actual volumes withdrawn will be provided in the Annual Report which confirms this assumption. As an example, see Section 4, Appendix D (Table D1-7) of the 2025 Annual Report.</p>
1d	<p>In response to CIRNAC-16, Agnico Eagle has intakes at Doris and Windy, the exact methods are already available and described in detail on the NWB registry (Doris Intake – design drawings T-11 and T-12; Windy Intake).</p> <p>As noted above, monitoring information from the Hope Bay Mine is available to the reviewer on the NWB public registry which confirms the project has been operating as expected. No material concerns have been raised by CIRNAC or others in relation to these monitoring results.</p> <p>There are no proposed changes to the existing NWB approved methods of extraction in the Application, and so there is no need to re-assess items relating to shoreline disturbance and sediment entrainment as suggested by the CIRNAC reviewer.</p>
1e	<p>The CIRNAC reviewer calculations (suggesting daily max discharge of 19,600 m³/d) are not accurate.</p> <p>The water balance and water quality model (Appendix F of the Application) provides predictions of discharge quantity and quality to the receiving environment (Roberts Bay); the expected range is 3,485 to 8,769 m³/day. A clear estimation of water returned to sources has been provided.</p>

Unresolved Information Requests ^(a)	Response
CIRNAC-2b	<p>The items listed by CIRNAC in their second round comments are existing infrastructure already approved by the NWB (and CIRNAC’s Minister).</p> <p>As noted above, the assessment phase of the Hope Bay Mine was previously completed by NIRB. However, to address points in CIRNAC’s review, the landfarm (as noted by CIRNAC) was already presented on map. The Doris intake and incinerator have been noted on the updated map in this response package. Agnico Eagle is not applying to make changes to any of the listed items in this application. Drainage pathways can be found in the 2017 FEIS, Volume 5, Section 1.2 (NIRB ID: 314856), if the reviewer is interested in this Background information.</p>
CIRNAC-3	<p>Agnico Eagle has provided a response to each of CIRNAC’s information requests related to the SIG in this as well as our previous submission.</p> <p>The statement “all parts of the project are subject to review” is not accurate. As noted above, the Hope Bay Mine has already completed all applicable regulatory reviews. Neither a renewal or an amendment trigger a “re-review” of an approved project. We have followed the guidance of the SIG and the form to use NA and provided our justification, per the form.</p>
CIRNAC-4	<p>Agnico Eagle maintains that these documents have already been provided and should not be filed separately in the current process. Providing separately during this process adds unnecessary duplication. To help the reviewer, references to specific sections, figures, tables, and/or appendices are provided. Agnico Eagle re-iterates that these documents have been previously reviewed and received conformity and are not part of the scope review. In our view providing duplicate documents within this process actually increases version control risks. Previous CIRNAC staff fully participated in the regulatory processes that focused on review of these documents, and we continue to rely on the outcomes of those robust processes.</p> <p>The SIG requests of CIRNAC can be found on the NWB registry at the following link: Annual Reports, and specifically</p> <ul style="list-style-type: none"> 5-7 (Annual AEMP, Appendix F of 2025 Annual Report) 5-11 (Annual AEMP, Appendix F of 2025 Annual Report) 5-28a (Annual Geotechnical Inspections – Appendix J of 2025 Annual Report) 6-20 (Section 4, Section 13, Appendix D, and Appendix J of 2025 NWB Annual Report) 6-22 (Section 4, Section 13, Appendix D, and Appendix J of 2025 NWB Annual Report) 6-33 (Agnico confirms signs are on-site) 7-5(Agnico confirms signs are on-site), and 7-10 (a summary of waste facilities and their efficacy can be found in Section 5 of the NWB Annual Reports; TIA general condition is outlined in Appendix J of 2025 NWB Annual Report, inspection activities are found in Section 13).

Unresolved Information Requests ^(a)	Response
CIRNAC-8b	To date CIRNAC and other reviewers have been satisfied with the site layout figures; however, Agnico Eagle will work on preparing updates to site layout figures. This item should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process.
8c	As per the Main Application Document (Section 3.3.12.1), the landfill is located in Quarry 2 as approved under the Water Licence. No changes are anticipated at this time. In addition, the landfill location has been previously reviewed (including by CIRNAC) and approved by the NWB.
CIRNAC-9	Agnico Eagle suggests these discussions can be held bilaterally and formally as part of the NWB process if needed during the technical review stage. As CIRNAC-9 is more of a technical comment than information request, this item should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process.
CIRNAC-14	Agnico Eagle suggests these discussions can be held bilaterally and formally as part of the NWB process if needed during the technical review stage. As CIRNAC-14 is more of a technical comment than information request, this item should not delay moving from the “information request” to the “technical review” stage in the NWB amendment process.
CIRNAC-15	The purpose of this request is unclear. There will be no discharge of effluent to freshwater bodies; discharge is to Roberts Bay. However, water quality is measured with results presented annually within the AEMP (Appendix F of the 2025 Annual Report). Further, Attachment 1 of Appendix E of the 2025 Annual Report provides water quality results, also reported annually. Monitoring currently occurs in the fall and spring from Doris Lake, Patch Lake, Windy Lake and Reference Lake B. Baseline water quality data has been collected seasonally since 1995 and where applicable has been incorporated into the AEMP.
CIRNAC-16a	The information for the pumping rates have been provided in design reports and are present on the NWB registry (Doris Intake : pages T-11 and T-12; Windy Intake , intake rate of 120,000 L/d). The hydrology analysis included with the submission (Appendix 4-C) assumed pumps would be operating at maximum capacity. Thus evaluation of water withdraw on lake elevation and streamflow was provided.
16b	Agnico Eagle reiterates its previous response, there are no requirements for minimum distance between a pump and the ordinary highwater mark. This is existing infrastructure and the purpose of this request is unclear. Finally, existing infrastructure can be discussed during inspection visits.

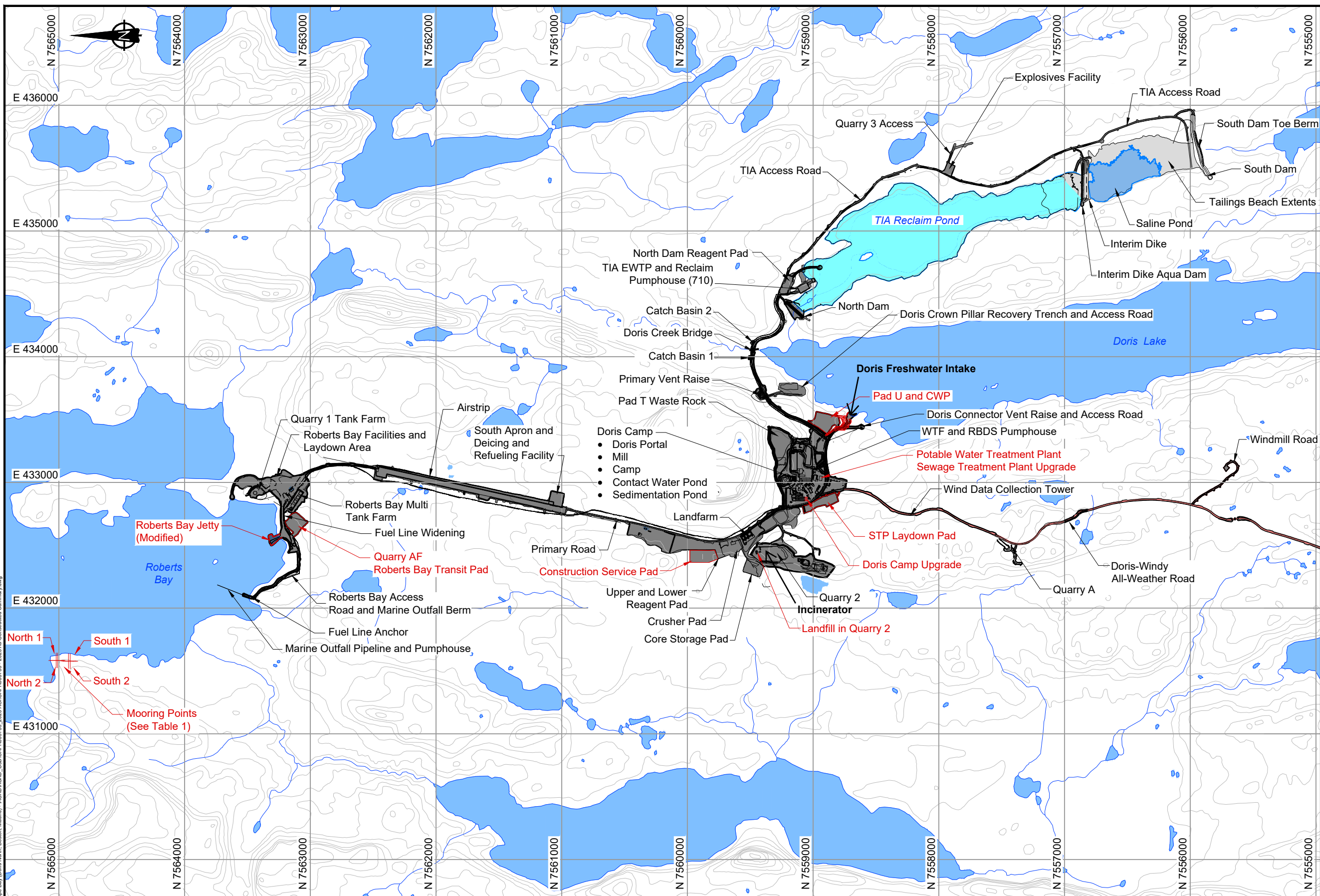
Unresolved Information Requests^(a)	Response
CIRNAC-17	<p>An updated Water Management Plan was provided with the submission (Appendix 6-P); this plan was updated to reflect the scope of activities in the Application. In addition, an updated Water and Load Balance model report was provided in the application (Appendix 4-F). The items identified by the reviewer are captured in the model report and the reviewer should examine the model report to confirm if the comments are addressed or if further information is needed during the technical review stage.</p> <p>The comments provided by the reviewer appear to be editorial in nature, but any specific questions on water management should be discussed during the technical review stage.</p> <p>Finally, Agnico Eagle reiterates its previous response, an updated Water Management Plan will be provided following the Water Licence Amendment process. Some of these updates may include the editorial comments provided by the reviewer.</p>
CIRNAC-18	<p>Agnico Eagle reiterates its previous response, Agnico Eagle is authorized under Part E, Item 1 to draw water for winter ice road construction and is not changing for the Amendment.</p>
CIRNAC-19c/d	<p>A renewal is not a re-approval of an approved project, or re-approval of existing infrastructure. We are looking to amend certain components and we have provided details on those components. Per above comments, all information for existing infrastructure that are not proposed to change are available on NWB public registry, and have been reviewed and approved by the Board and CIRNAC Minister.</p> <p>The purpose of this request is unclear. Monitoring data available on the NWB registry confirms previous conclusions and assumptions consider during previous NWB processes.</p>
CIRNAC-21	<p>Agnico Eagle reiterates its previous response and per above comments, all information for existing infrastructure that are not proposed to change are available on NWB public registry, and have been reviewed and approved by the Board and CIRNAC Minister.</p> <p>The purpose of this request is unclear. Monitoring data available on the NWB registry confirms previous conclusions and assumptions consider during previous NWB processes.</p>
CIRNAC-22	<p>Agnico Eagle reiterates its previous response and per above comments, all information for existing infrastructure that are not proposed to change are available on NWB public registry, and have been reviewed and approved by the Board and CIRNAC Minister.</p> <p>The purpose of the request to provide information on existing culverts is unclear.</p>

Unresolved Information Requests ^(a)	Response
CIRNAC-23	<p>Agnico Eagle reiterates its previous response and per above comments, all information for existing infrastructure that are not proposed to change are available on NWB public registry, and have been reviewed and approved by the Board and CIRNAC Minister.</p> <p>The 2017 submission included details on the North Dam, South Dam, and West Dam.</p> <p>As per Part I, Item 9 of the licence, annual geotechnical inspections of surface infrastructure and earthworks are completed and reported. See Appendix D.1 and Annual Geotechnical Inspections – Appendix J of the 2025 NWB Annual Report).</p> <p>The purpose of the request to review descriptions of diversions (including ditches) and dikes is unclear.</p>
CIRNAC-24	<p>Timing for submission to be discussed at the technical review stage.</p>
CIRNAC-25	<p>Block 15 did include quantities for material that can be forecasted. Domestic waste and contaminated soil will vary and are reported annually. As per the STP Design Report submitted to the NWB (and reviewed by Parties including CIRNAC, and approved by the NWB), it is estimated that approximately 0.23 m³/day sludge cake will be produced. The initial phase of the landfill (reviewed by Parties including CIRNAC, and approved by the NWB) has the capacity of approximately 26,400 m³ of industrial waste, with a flexibility for a second phase of 75,000 m³ of industrial waste. Further details would be provided for the second phase should it be required.</p>
CIRNAC-27	<p>Under Project Certificate No. 003, Term and Condition 6, Agnico Eagle has the ability to notify for further alternatives assessments undertaken for the Tailings Impoundment Area. Agnico Eagle completed an MAA and described the preferred option in the Water Licence Amendment. The full MAA report will not be provided as it contains confidential information, and is not relevant to the water licensing process. In addition, as noted in Section 5.1 of the Main Application Document, if the alternative tailings deposition is selected, Agnico Eagle will provide further details on the design at that time.</p>
CIRNAC-28	<p>Agnico Eagle reiterates its previous response and per above comments, all information not proposed to change are available on NWB registry, and have been reviewed and approved by the Board and CIRNAC Minister. Past information on discharge criteria can be found in Decision Reports from the NWB (example, Amendment 2)</p> <p>Discharge criteria listed in Part F, Item 5 and Part F, Item 18 are for discharge to tundra as agreed during licensing processes.</p>
CIRNAC-29	<p>As with Agnico Eagle past experience with Amendments, management plans will be updated following the Water Licence Amendment approval to reflect technical comment discussions. This is not a new process or term that the NWB has applied in past licensing.</p>
CIRNAC-31	<p>To our knowledge, this comment has never been raised in the past through inspections or inspector reports. We can confirm we use appropriately trained personnel for the task. The inspector can request to discuss this during the annual inspection visit. We reiterate that the information is not relevant to a Water Licence Amendment.</p>

Unresolved Information Requests ^(a)	Response
CIRNAC-33	<p>Agnico Eagle confirms the requested information has been provided.</p> <p>The information can be found in the Water and Load Balance Model provided in Appendix E (of the 2025 Annual Report), for applicable discharge locations, monitoring stations, and sumps (water quality information is provided in: Tables 5-2, 5-3, 6-2 and Appendix D of the Water and Load Balance report; water quantity information is provided in: Tables 5-2, 6-1 and Appendix C of the Water and Load Balance report).</p> <p>Adaptive management and mitigation/contingency measures are currently addressed within the AEMP for specified waterbodies (Appendix F of the 2025 Annual Report). Other adaptive management, mitigation/contingency plans relating to critical infrastructure may be captured within the appropriate Management Plans and/or Operations, Maintenance and Surveillance Manuals to reflect actual site conditions during the Operational phases of the project and will be provided within the Annual Reporting process upon approval of the current application.</p>
CIRNAC-34d	<p>As per Part D, Item 5 of the Licence: monitoring during construction (including daily inspections) must be completed. There is no licence requirement to submit stand alone construction monitoring plans for review. As per Part D, Item 11, and Schedule D, Item 2, a construction summary report (including monitoring) will be provided following the terms of the Licence.</p> <p>Agnico Eagle reiterates that Design Reports were prepared based on the Conditions of the Licence. Construction monitoring, to address Part D, Item 5, includes activities such as</p> <ul style="list-style-type: none"> • Erosion and Sediment control <ul style="list-style-type: none"> ○ Installation of silt fence or silt curtain location dependent monitored during construction ○ Inspections after precipitation events or freshet monitoring ○ Inspection of dewatering equipment, discharge locations, and sampling ○ Ensuring compliance with water quality monitoring requirements • Wildlife surveys, which would also be sensitive to seasonal timing and restricted periods • Avoidance of sensitive habitats or archeological zones • Site tidiness and proper waste management • Inspections of equipment for leaks or spills, spill kits and secondary containment of any hazardous materials • Adherence to licence conditions • Construction QA/QC of geotechnical and liner installation <p>Inspections typically occur prior to starting work, daily during construction, and then a final walk through afterwards.</p>

Unresolved Information Requests ^(a)	Response
34e	<p>Agnico Eagle reiterates that Design Reports were prepared based on the Conditions of the Licence. However, post-construction monitoring may include items such as</p> <ul style="list-style-type: none"> • Erosion and Sediment control <ul style="list-style-type: none"> ○ Ensuring compliance with water quality monitoring requirements • Adherence to licence conditions <p>Post-construction (or Construction Summary reports) are provided as per Part D, Item 11 and Schedule D, Item 2 of the licence.</p>
CIRNAC-37	<p>Agnico Eagle reiterates its previous response and per above comments, all information not proposed to change are available on NWB registry, and have been reviewed and approved by the Board and CIRNAC Minister. The water for proximal sources was included in the 2018 Amendment. The current licence Amendment is not requesting a change in the quantity of water from proximal sources. History of the 2018 Amendment is located on the NWB registry.</p>
CIRNAC-39	<p>As mentioned, the landfill in Quarry 2 is already approved and is not changing as part of this Amendment. The landfill is not yet operational; though is approved. CIRNAC was part of the review of the landfill so further review as part of this amendment is not required. However, as requested, the landfill documentation (link to letter to NWB, plan update, approval) are on the NWB site.</p>

a) Please refer to the [NWB registry](#) for the fulsome comments from parties.



LEGEND

- Existing As-Constructed Infrastructure
- 2025 As-Constructed Infrastructure
- Disturbed Tundra Extents
- Tailings Beach Extents
- TIA Reclaim Pond

NOTES

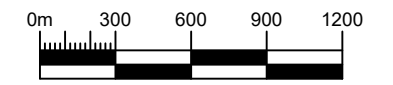
- All units are in meters unless otherwise specified.
- Contours are shown at 10.0 m intervals.

REFERENCES

NAD83 CSRS UTM Zone 13.
 2025 As-constructed linework derived from drawings provided by Client.

Known Points

Table 1		
ID	Northing	Easting
North 1	7565021.85	431583.71
North 2	7565010.92	431583.94
South 1	7564909.55	431577.05
South 2	7564923.58	431578.96



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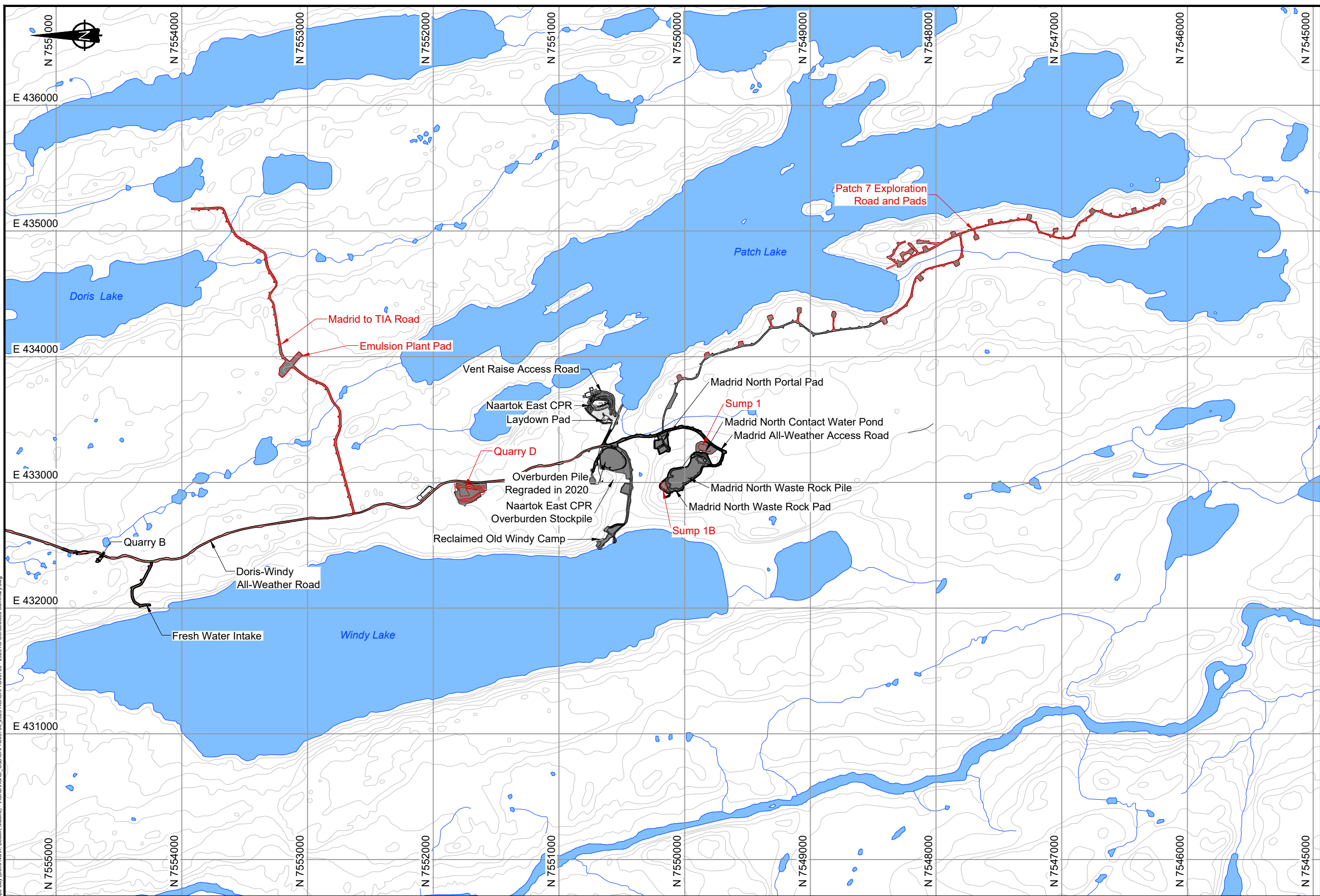
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Hope Bay

2025 Annual Report

Doris Area 2025
As-Constructed Summary

DATE: February 2026 APPROVED: PDL FIGURE: 01

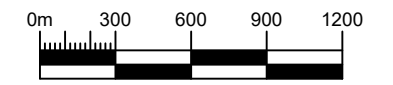


LEGEND

	Existing As-Constructed Infrastructure
	2025 As-Constructed Infrastructure
	Disturbed Tundra Extents

- NOTES**
1. All units are in meters unless otherwise specified.
 2. Contours are shown at 10.0 m intervals.

REFERENCES
 NAD83 CSRS UTM Zone 13.
 2025 As-constructed linework derived from drawings provided by Client.



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Hope Bay

2025 Annual Report		
Madrid North Area 2025 As-Constructed Summary		
DATE: February 2026	APPROVED: PDL	FIGURE: 02