July 3, 2026

Ali Shaikh
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B IJ0

Re: Response to 2AM-DOH1335 Water Licence Amendment – Operational Update – Technical Comments

Dear Mr. Shaikh,

Agnico Eagle thanks the Nunavut Water Board for the opportunity to respond to the 2AM-DOH1335 Water Licence Amendment – Operational Update – Technical Comments.

Agnico Eagle submits these responses from the position of an experienced, responsible, and well-established operator with a long history of regulatory engagement in Nunavut.

Hope Bay is not a new site. It is a previously assessed, previously approved, and actively regulated mine with existing infrastructure, approved management plans, and ongoing monitoring, inspection, and reporting requirements that continue to be implemented through the current Water Licence and annual regulatory processes. The restart of mining at Hope Bay that will be enabled by the approval of this amendment to 2AM-DOH1335 represents a long-term investment in people, communities, and responsible mining in Canada's North and has the potential to evolve into a long-life, district-scale mining camp for decades to come.

Our comments to technical comments are provided in the enclosed.

Agnico Eagle looks forward to a productive and successful Technical Meeting and Pre-hearing Conference in Cambridge Bay on July 16-17, 2026.

Regards,

Colleen Prather
colleen.prather@agnicoeagle.com
Superintendent, Permitting & Regulatory Affairs

Table of Contents

ATTACHMENTS

KITIKMEOT INUIT ASSOCIATION (KitIA)

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-01**
Re:	**Hope Bay Operational Update Scope Activities**		

Request Made by Interested Party:
The KIA requests the following:

- *The Proponent should quantify or estimate all changes under the "Water License Amendment" application column, like the quantification provided under the current Water License "Approved" column.*
- *If the proponent is unable to quantify these in advance (as an estimate), please explain why not.*

Agnico Eagle's Response to Request:

Response to bullet 1)

The intent of Table 1.2-1 was to provide a high-level summary of the scope of activities included in the Water Licence Amendment application and to identify where previously approved activities are being optimized as part of the Hope Bay Mine restart. As noted in Section 1.2, several aspects of the Operational Update remain subject to further detailed engineering and design development. Where detailed engineering was available at this time, it was provided (e.g., Appendix 3-B and 3-C). For the infrastructure that is currently based on conceptual designs, Agnico Eagle will follow the usual course requirements for detailed design reports for other water, waste, and fuel-related infrastructure, which will be submitted to the NWB for review and approval prior to construction in accordance with Part D, Item 1 of the Water Licence.

Response to bullet 2)

Where quantitative information was available at the time of application, it was provided in Table 1.2-1 and throughout the application (e.g., mill throughput, freshwater withdrawal volumes, and fuel storage capacities). Quantitative estimates for certain infrastructure components (e.g., temporary ore stockpiles, waste rock stockpiles, overburden stockpiles, and some water management infrastructure) have not been provided because the detailed engineering and facility design required to define the final dimensions and configuration of these facilities have not yet been completed. The application figures however, identify the infrastructure development areas and define the extent to which these facilities may ultimately be constructed. See also KitIA-NWB-04 for more detailed preliminary figures.

All proposed infrastructure remains within areas previously assessed and approved under Project Certificates No. 003 and 009. Consistent with established Water Licence requirements, detailed design information will be developed through the engineering process and submitted to the NWB for review and approval prior to construction.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-02**
Re:	**Additional Marine Outfall Diffuser not included in the updated scope activities**		

Request Made by Interested Party:

The KIA requests the following:

- *Clarify the uses and end points of the additional water that will be withdrawn from the lakes within the main application document for the Water License Amendment. This helps reviewers understand what will happen to the additional water that is withdrawn from the lakes.*
- *The Proponent should include the new marine outfall along with the anticipated change in outflow between the current license and the application within Table 1.2-1, along with relevant text.*

Agnico Eagle's Response to Request:

Response to bullet 1)

The uses of freshwater are provided in Table 1 below, with total predicted intakes by water source and usage type. The end-point for all streams is the TIA except for potable water which ends up treated in the Sewage Treatment Plant (STP) and discharged to the tundra as per the Water Licence.

Table 1 Freshwater Taking Summary Table (Source: Provided in response to IR (CIRNAC-IR-01); April 9, 2026)

	Doris Lake	Patch Lake	Windy Lake	Proximal Sources	Total
Total Volume Requested for Water Licence Amendment (m^3/year)	2,637,125	59,860	159,870	60,000	2,916,855
Potable	90,000				
Process Plant	2,200,000				
Dust Suppression	25,000				
Other Industrial Uses	115,713				
Subtotal	*2,430,713*				
Contingency	20%				
TOTAL	**2,916,855**				

Response to bullet2)

The new marine outfall will run parallel to the existing outfall (Figure 1.2-1: Operational Update: Roberts Bay) with the new diffuser about 350-m north of the existing diffuser (Appendix 4-G, Figure 2.1). As per response to KitIA-NWB-04, site layout figures have been provided. It is noted however that as this infrastructure is located within the marine environment, the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* is not applicable to that particular infrastructure and so this information is provided to the NWB for information only.

The predicted discharge rates from the diffusers were provided in Appendix 4-F in Table 5-1.

Interested Party:	KitIA	Rec No.:	KitIA-NWB-03
Re:	Avoidance measures are not specified in terms of the placement of new infrastructure		

Request Made by Interested Party:
The KIA requests the following:

- *For clarity, please provide a table of proposed activities/changes at the mine that are planned, whether they may or may not relate to the Water License Amendment. Then please indicate which activities/changes apply to the Water Licence amendment application.*
- *Please provide a discussion of the avoidance measures used to reduce the potential for the proposed new infrastructure/activities to affect the environment, particularly waterbodies/watercourses.*

Agnico Eagle's Response to Request:
Response to bullet 1)
The scope of activities for the Water Licence Amendment is listed in Table 1.2-1, which provides a high-level summary of the scope of new/amended activities and infrastructure included in the Water Licence Amendment application. As KitIA note in their comment review, the emulsion plant and the marine discharge were two scope items not originally listed within Table 1.2-1. The rationale is as follows:

- Explosive use is an approved activity and the facilities related to that activity are not changing specifically due to the amendment application. The NWB were notified on June 13, 2025 of the emulsion plant location and was communicated to parties the same day (NWB registry). Within that notice, there was indication that a design report will be provided. This is following condition Part D, Item 1 of the Licence.
- Marine discharge is not a mandate of the NWB under the NWNSRTA and therefore was excluded from the main scope of activities included in the amendment listed in Table 1.2-1. This said, Appendix 1-A makes note of the second discharge line. In addition, a technical study (Appendix 4-G) was provided for overall context to the Operational Update.

Response to bullet 2)
Agnico Eagle will continue to follow the established avoidance measures that have been developed at Hope Bay and other Agnico Eagle Nunavut mine sites over almost two decades of exploration and mining. There are no unique new avoidance measures that have been identified as necessary due to the Operational Update. As an approved mine with existing infrastructure, mitigation measures are already in place including adhering to Licence Conditions under Part D: *Conditions Applying to Construction and Operation*. In addition, a comprehensive catalogue of NWB-approved (and KitIA reviewed) Management Plans exist under the Water Licence and other related approvals to protect the environment, including waterbodies and watercourses. Some examples of mitigation measures that will continue to be followed in respect of the amended infrastructure include:

- Doris-Madrid Water Management Plan (Appendix 6-P, Section 5.2): Control measures outlined to prevent solids entrainment into receiving waters. Effective erosion and sediment control measures are installed prior to construction work commencing to minimize the potential for the introduction of sediment into watercourses or waterbodies.
- Spill Contingency Plan (Appendix 6-M, Section 4.1.1): Control measures include all bulk fuel facilities are located in secondary containment (i.e., tank farms which have containment designed to contain volumes equivalent or greater than 110% of the aggregate or total volume of the largest container in the containment – whichever is greater).
- Explosives Management Plan (Appendix 6-D, Section 2.2): Consideration of the plant follows the National Standard of Canada *CAN/BNQ 2910-510/2015 Explosives – Quantity Distances guidelines.* In addition, this section also speaks to design criteria that will be used for the facility and associated storage area, to assist in the safe and secure storage of fuel and hazardous materials. An example listed in the plan includes the emulsion plant respects the 31 m required separation distance to surface waters).

Finally, as per Part D, Item 1 of the Licence, 60-day Design Reports are submitted to the NWB detailing standard practices to be implemented throughout construction. These reports will continue to include:

- construction methods and procedures outlining how infrastructure will be put in place, including quality assurance and quality control measures
- technical specifications for sedimentation, erosion control and bank stabilization measures, including proposed materials, location and extent, place methods and quantities required

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-04**
Re:	**Maps on pages 7 –10 need a caption, figure number and could use clarity on the location of the proposed infrastructure**		

Request Made by Interested Party:
The KIA requests the following:

- *Please add a caption and figure number (assume Figure 1.1-3) to the maps on pages 7-10.*
- *Please provide the location of the proposed infrastructure within the purple polygons on the map for clarity.*

Agnico Eagle's Response to Request:
As discussed in response to KitIA-NWB-1, infrastructure areas identified in the application figures define the extent within which facilities (e.g., ore, waste stockpiles) may be developed.

The figures presented in Section 1.2 of the Main Application Document are Figures 1.2-1 to 1.2-4. As noted in response to IRs, Agnico Eagle acknowledges that figure numbers were not included; however, captions were provided. For clarity:

Figure Number	Caption per Figure in Main Application Document	PDF Page in Main Application Document
1.2-1	Operational Update: Roberts Bay	15
1.2-2	Operational Update: Doris	16
1.2-3	Operational Update: Madrid Area	17
1.2-4	Operational Update: Madrid to TIA	18

To address the KitIA's comment of proposed locations, Agnico Eagle has provided the following maps to present existing infrastructure, approved but not constructed infrastructure, and the preliminary 2026 proposed additions for the Doris Area (Figure 1) and Madrid - Patch Area (Figure 2). We reiterate that, consistent with Water Licence requirements, detailed design information will be developed through the engineering process and submitted to the NWB for review and approval prior to construction, which will include infrastructure location specifics.

N 7565000
N 7564000
N 7563000
N 7562000
N 7561000
N 7560000
N 7559000
N 7558000
N 7557000
N 7556000
N 7555000

E 436000
E 435000
E 434000
E 433000
E 432000
E 431000

Roberts Lake
Little Roberts Lake
Roberts Bay
Glenn Lake
Doris Lake
TIA Reclaim Pond

Saline Pond 1 (Quarry 3)
Saline Pond
Tailings Beach Extents
Madrid - Doris Pipeline
TIA EWTP and Reclaim Pumphouse
Pad U Waste Rock
Contact Water Pond 1C
Contact Water Pond 1
WTP and RBDS Pumphouse
Contact Water Pond 1A
Potable Water Treatment Plant
Sewage Treatment Plant Upgrade
Pad T Waste Rock
Doris Camp
- Doris Portal
- Mill
- Camp

Quarry 1
Roberts Bay Multi Tank Farm
Quarry AF
Landfarm
STP Laydown Pad
Doris Camp Upgrade
Construction Service Pad
Reagent Pad
Crusher Pad
Core Storage Pad
Landfill
Quarry 2
Quarry A
Marine Outfall Pipeline and Saline Pumphouse
Marine Outfall Pipeline and TIA Pumphouse

LEGEND

- Flow Direction
- Existing As-Constructed Infrastructure
- Tailings Impoundment Area
- Approved, not constructed
- 2026 Proposed Addition
- Disturbed Tundra Extents
- Tailings Beach Extents
- TIA Reclaim Pond
- Regional Watershed
- Approved, not constructed Watershed
- 2026 Proposed Addition Watershed
- Existing Infrastructure Watershed

NOTES

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

WTP = Water Treatment Plant
RBDS = Roberts Bay Discharge System

REFERENCES

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

0m 300 600 900 1200

C:\Users\thaye\SRK Consulting\FS208 Hope Bay (Doris North, Boston, Madrid) - IACAD\CAD_C3D\CAPR004394_2026 WL Support\CAPR004394 - GA.dwg

srk consulting

SRK JOB NO.: CAPR004394
FILE NAME: CAPR004394 - GA.dwg

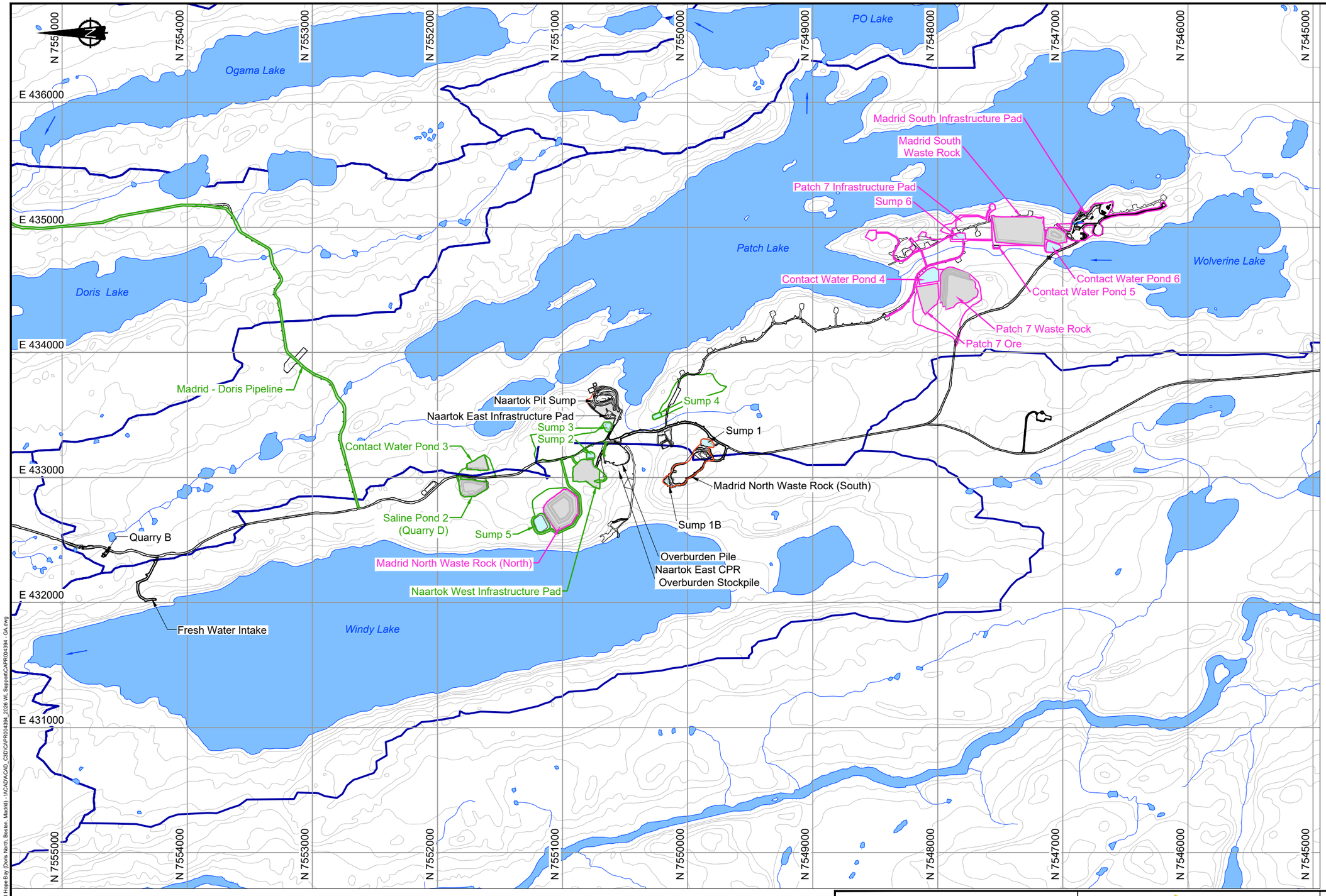
AGNICO EAGLE

Project Title

2026 Water License

Doris Area Summary

DATE:	APPROVED:	FIGURE:
May 2026	-	1



LEGEND

- Flow Direction
- Existing As-Constructed Infrastructure
- Approved, not constructed
- 2026 Proposed Addition
- Regional Watershed

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.

0m 300 600 900 1200

srk consulting

SRK JOB NO.: CAPR004394
FILE NAME: CAPR004394 - GA.dwg

AGNICO EAGLE

Hope Bay

2026 Water License

Madrid - Patch Area Summary

DATE: May 2026 | APPROVED: - | FIGURE: 2

C:\Users\thayes\SRK Consulting\F5208 Hope Bay (Doris North, Boston, Madrid) - 1ACAD\ACAD_C3D\CAPR004394_2026 WL Support\CAPR004394 - GA.dwg

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-05**
Re:	**Tailings Impoundment Area (TIA) capacity**		

Request Made by Interested Party:
The KIA requests the following:

- *Please provide information on the anticipated adequacy of the TIA to store tailings for the proposed increase in production, given that no new infrastructure is proposed for the TIA.*

Agnico Eagle's Response to Request:
Agnico Eagle is confident in the evidence that supports its conclusion that the TIA will be more than adequate to store tailings produced by the new mill. The Operational Update is best understood as an optimization and refinement of the approved Hope Bay Mine, rather than a new project or a new type of activity. Mining, milling, waste rock management, tailings deposition, water management, and closure remain activities previously assessed for the Hope Bay Mine. The overarching goal in this amendment is to use existing infrastructure where possible to ensure it is used to its fullest design capacity, which will help Hope Bay to continue to operate within a minimized footprint and reduce potential for negative environmental effects.

For tailings capacity, the Doris TIA remains Agnico Eagle's preferred and suitable location for surface tailings management. The Doris TIA has sufficient capacity to accommodate the proposed increase in production without the need for additional TIA infrastructure. This is primarily due to the inclusion of options in the amendment, should additional capacity be needed in future. The deposition strategy in the application includes continuation of slurry deposition, with the option to transition to a dry-stacked, filtered, tailings and paste backfill. Should the decision be made to continue with slurry tailings deposition, the dam raises currently approved may be constructed. Should the decision be made to transition to filtered tailings, dam raises are not anticipated as filtered tailings have a significantly higher in-place density than slurry tailings, resulting in greater storage efficiency and allowing additional tailings volumes to be stored with only minimal expansion of the deposition area. This updated approach was developed specifically to increase effective storage capacity while limiting incremental environmental disturbance by using the existing tailings facility in the general area of Tail Lake (see CIRNAC-TRC-16).

Also see response to KitIA-NWB-10.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-06**
Re:	**Optimizing freshwater withdrawals to minimize effects on fish and wildlife**		

Request Made by Interested Party:
The KIA requests the following:

- *Please include language to indicate that freshwater withdrawals at Doris Lake, Windy Lake, and/or Patch Lake will also minimize effects to fish and wildlife.*

Agnico Eagle's Response to Request:
The Main Application Document (Section 3.3.8.1, p. 21 and Section 4.2.1) includes the following language: 'Agnico Eagle will optimize freshwater withdrawals at Doris Lake, Windy Lake, and/or Patch Lake to minimize effects to fish habitat, consistent with the 2017 FEIS.'

Agnico Eagle confirms that it will continue to operate in compliance with the Water Licence, which has already included protective terms and conditions designed to minimize effects to fish and wildlife (such as the mandated requirement to screen withdrawal infrastructure to prevent impingement). Agnico Eagle will also follow the advice of applicable DFO policies and legislation, and DFO (who is the Federal authority with jurisdiction over impacts to fish and fish habitat) has not raised any significant concerns relating to the amendment application.

The section of the Main Application Document above considers the modelling approach used in drafting the proposed withdrawal volumes, where effects to fish and fish habitat were minimized through consideration of watershed sizes and drainage patterns. For example, withdrawals were prioritized from Doris Lake over Patch Lake as Doris Lake has both a larger surface area and watershed area than Patch Lake, and it is a downstream waterbody.

The effects associated with the operational update water withdrawals are limited to streamflow and are of a nature that are well known and predictable based on the over two decades of exploration and mining activity at the Hope Bay site. Effects to lake volume are negligible in open-water conditions, and are less than 10% in ice-covered conditions (see Appendix 4-C of the application), and therefore are in alignment with the *DFO Protocol for Winter Water Withdrawal from Ice-Covered Waterbodies in the Northwest Territories and Nunavut* (DFO, 2010).

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-07**
Re:	**Details on updates to the management plan appendices are missing**		

Request Made by Interested Party:
The KIA requests the following:

- *In each section where an existing management practice appendix is referred to, please provide summary text that confirms whether the plan was updated and provide a summary of how the plan was updated to address changes to the Project proposed in the Water Licence Amendment.*

Agnico Eagle's Response to Request:
As Hope Bay remains a care and maintenance site at this time, current site plans are reflective of the current project status. As required by Part B of the Water Licence, Agnico Eagle reviews its plans approved under the Water License on a regular basis, and submits updates to the NWB for review at the appropriate times, based on the Conditions of the Licence (typically with the Annual Report but also from time to time on an as needed basis).

A list of management plans that will be impacted by the amendment were provided with the application. In each of the management plans there is a document control section that briefly summarizes updates included in the document. In addition, there are yellow flags through the document to show specifically where information was updated.

KitIA noted in their review comment that it would be beneficial to identify and describe any updates to the referenced management practices or appendices that are associated with the proposed production increases. The text within sub-sections of section 3.3 of the Main Application Document indicates that management plans already exist (i.e., unlike a new project that would require creation of a new plan) and we will continue to adhere to management plans throughout the mine life. In many cases, management practices will continue as-is and are adequate for the scope of activities proposed. For example, in the Incineration and Composter Waste Management Plan (Appendix 6-H), the plan was updated for anticipated waste entering the composter (Section 2.2.2); however, the overall ongoing management and monitoring practices are not different as a result of the new mill and so do not change due to the Operational Update. Similarly, in the Hazard Waste Management Plan (Appendix 6-F), hazardous waste storage, handling, monitoring, do not change because of the Operational Update; they will continue as-is.

Regarding the KitIA comment on the Domestic Wastewater Treatment Management Plan, in response to ECCC-IR-05 (response package April 9, 2026), Agnico Eagle noted the STP upgrade increases treatment capacity and improves system reliability but does not change the approved effluent discharge configuration. Further, potential erosion and sedimentation associated with increased discharge volumes will be managed in accordance with the Doris–Madrid Water Management Plan and the Domestic Wastewater. Therefore, the Domestic Wastewater Treatment Management Plan submitted with the

Application was adequate for the Operational Update, was revised and documented accordingly, and will be reviewed and updated as needed, throughout the mine life.

Agnico Eagle acknowledges that some management plans may require revisions as the Mine advances through operations and will be submitted based on the conditions of the Licence. Agnico Eagle will continue to follow the NWB licence requirements:

- Schedule B, Item 7 "*Annual review of and submission of any revisions to the Management Plans or Emergency Response or Contingency Plan in the form of either addenda or revised Plan*"; and
- Part B, Item 15 *"The Licensee shall review the Plans referred to in this Licence as required by changes in operation and/or technology and modify the Plans or Manuals accordingly. Revisions to the Plans or Manuals are to be summarized and submitted in the form of an Addendum to be included with the Annual Report required by Part B, Item 2, complete with a revisions list detailing where significant content changes are made. "*

Again, it is not unusual for updated management plans to be provided to the NWB for review and approval following the issuance of an amendment. This approach allows for efficient and focused review of any necessary planned updates based on the outcomes of the amendment process. Additional details on management plan revisions are provided in response to CIRNAC-TRC-8, ECCC-TRC-07, and ECCC-TRC-08.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-08**
Re:	**Water withdrawal monitoring/reporting**		

Request Made by Interested Party:

The KIA requests the following:

- *Please provide information on how water withdrawals from the various waterbodies proposed for the Water License Amendment will be monitored/reported.*

Agnico Eagle's Response to Request:

Agnico Eagle does not plan to change the current withdraw monitoring/reporting processes that have already been established under the Water Licence. All permanent pumphouses and manual withdrawals (current and future) use flowmeters to support withdrawal monitoring and compliance reporting. Data is compiled and stored and reported monthly and annually to the NWB through the main annual report, and through the AEMP.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-09**
Re:	**Water balance versus requested water withdrawal**		

Request Made by Interested Party:

The KIA requests the following:

- *Please provide additional information on the years of data used for the modeling of the water balance, including the HEC-RAS for all three lakes.*
- *Please provide a discussion of the limitations and uncertainties associated with the modeling and the impacts of uncertainties, and (if applicable) how monitoring and contingencies on withdrawals will consider real time data (e.g., to take less water than permitted, if needed).*

Agnico Eagle's Response to Request:

Based on the comment from the reviewer, Agnico Eagle would like to clarify a few items related to under-ice lake volume reductions. The following example shows the reduction in under-ice volume calculations for each source lake for the month of May (the last month with ice cover):

	Doris	Patch	Windy
May under-ice water volume (m^3); (Total volume - max ice volume)	20,695,605	11,920,825	48,060,175
DFO protocol water volume is maximum of 10% under-ice volume (m^3)[a]	2,069,561	1,192,083	4,806,018
Agnico Water Use Request; Total per year (m^3)	2,637,125	59,860	159,870
Under-ice volume reductions (%) [b]	-9.1	-1.8	-0.2

Note:

a The DFO protocol requires that no more than 10% of under-ice lake volume be withdrawn in winter.

b Appendix 4C of the Water License Amendment application.

<u>Response to bullet 1)</u>

The monitoring years of data used for modelling are stated in Table 2-4 of Appendix 4-C of the Water Licence Amendment application, and are as follows:

- Doris Lake Outflow: 2009-2023
- Patch Lake Outflow: 2009-2011, 2018-2023
- Windy Lake Outflow: 2009-2010, 2012-2014, 2019-2023

The combined dataset for mean daily flow across all years was used to calculate the mean daily flow hydrograph for an average year. The average year was used to calibrate the water balance model, with outputs used for the HEC-RAS modelling (baseline vs predicted impacts).

Natural year to year variation in flows can introduce uncertainty in the analysis, but this was mitigated using conservative starting assumptions for the modelling approach, such as:

- Under-ice habitat loss considerations
    - The analysis of under-ice habitat loss used the lowest expected starting elevation (the lake invert elevation) and maximum ice thickness (2 meters)

  - A less conservative approach would be to assume an average year starting lake surface elevation and ice thickness for the winter season
- Onset of freshet
  - Timing in the spring can be gradual or sudden depending on spring weather conditions
  - An average year was used which creates a gradual onset of freshet, and greater relative impact to the spring flows
  - A less conservative approach would be to assume a sudden onset of freshet caused by wet or hot weather, which would mitigate the impact of winter water withdrawals by quickly filling the lakes reducing the delay in lake outflow.

Response to bullet 2)

The modelling was developed to predict the likely impact of proposed water withdrawals against the modelled baseline using conservative assumptions.

Regarding the limitations and uncertainty in the model:

- Climate change:
  - In the event of warmer average annual temperature and increased annual rainfall, this is likely to result in a shorter winter season, thinner maximum ice thickness, and increased lake outflow.
  - These changes would likely reduce the impacts of winter withdrawals on fish habitat in the lakes.
  - Level of uncertainty is low.
- Bathymetric surveys of Doris Lake, Patch Lake, and Windy Lake were conducted between 2006 and 2008.
  - Results of these surveys are still relevant because significant changes to the lake geometries are unlikely.
  - Slumping or collapse of any lake shorelines have not been observed to date.
  - Level of uncertainty is very low.
- The hydrometric stations operating in Doris, Patch, and Windy lakes use station datums tied to geodetic elevations to report water elevation in meters above sea level
  - These datums were established by surveying the local hydrometric station benchmarks with an RTK system tied to established mine benchmarks, surveyed between 2016 and 2020.
  - Tying the bathymetric surveys to the hydrometric station datums allows for the two data sets (lake level and volume-elevation curve) to be directly comparable.
  - The description on page 3 of Appendix 4-C explains that the water level and bathymetric surveys were tied to a geodetic datum to enable the analysis, it is not stating which years of data were used in the analysis.
  - Level of uncertainty very low.

- The HEC-RAS models used the output of the water balance model (i.e., monthly flow for an average year under both baseline and water withdrawal conditions)
    - The modelled average year was calculated using all available mean daily monitoring data for each lake. Lake outflows are frozen from November to mid-May, so only May to October flows were part of the HEC-RAS model analysis.
    - Level of uncertainty very low
- Following the development of Appendix 4-C, Agnico Eagle confirms that a HEC-RAS model for Windy outflow was developed and is included in Appendix E of the Hope Bay Mine Fisheries Offsetting Plan (Appendix 6-Q of the Water License Amendment application).
    - Level of uncertainty very low

In summary, uncertainties in the modelling approach were addressed through the use of conservative assumptions and aggregated datasets.

On-going monitoring of flows and reporting on water withdrawal usage will provide an opportunity to evaluate predictions and guide contingencies, if required, into the future.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-10**
Re:	**Alternative tailings management approach**		

Request Made by Interested Party:
The KIA requests the following:

- *Please provide additional information on the tailings management approach that is part of the Water License Amendment.*
- *Alternatively, please clarify that any other alternatives for tailings management will be managed within a separate application process, if, and when, it arises.*

Agnico Eagle's Response to Request:
Response to bullet 1)
See response to KitIA-NWB-05 for a description of the tailings deposition/management approach.

Accordingly, to support potential transition from slurry to filtered tailings deposition, a TIA Conceptual Design Assessment (Appendix 3-A) was prepared, addressing geotechnical and hydrotechnical considerations, stability, and monitoring. This also aligns with the approach under Project Certificate No. 003, Term and Condition No. 6 which acknowledges that it is possible that the TIA may require a notice.

Response to bullet 2)
The alternatives for tailings management that are known at this time were included in the amendment application and so Agnico Eagle does not anticipate that proceeding with any of those options in future would trigger a separate amendment process. The changes to deposition methods described in the application, supported by detailed engineering reports and associated studies (e.g., Water and Load Balance), and relevant management plans (e.g., OMS for Doris Tailings Impoundment Area, tailings deposition plan) would be submitted to the NWB for review as a notice. The updated security includes a tranche linked to the transition in tailings deposition described in the application, and this would occur as an automatic update to security that would be triggered upon proceeding with the activity as described.

If any new alternatives are identified in future that are not already described in the amendment application, Agnico Eagle would follow the applicable NWB processes and procedures for approval, based on Project Certificate No. 003 and the terms and conditions of the Water Licence.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-11**
Re:	**Closure of Doris TIA**		

Request Made by Interested Party:
Clarify what the conceptual closure plan for the tailings is (infiltration reduction cover that incorporates a geosynthetic membrane or a 0.3 m thick rockfill physical isolation cover. Clarify which cover concept was used to project post closure water quality.

Agnico Eagle's Response to Request:
The closure concept for the Doris TIA remains at a conceptual level and will be advanced through updates to the ICRP. This is typical given that the closure of the Doris TIA is not anticipated for many years. The conceptual closure plan for the TIA is a physical isolation cover consisting of approximately 0.3 m thick rockfill overtop of the tailings to prevent erosion and mobilization of tailings (Section 4.5.3. of the Hope Bay Doris-Madrid ICRP). This cover concept has previously been assessed to be appropriate for the current deposition plan of slurry tailings, and is not a novel cover concept in the North.

The addition of the low permeability geomembrane cover referenced in Appendix 4-E and Appendix 4-F should be interpreted as one potential mitigation amongst others for closure of the dry-stack tailings. While it is possible that some form of mitigation may be required to achieve long-term closure objectives, at this time based on current data we don't assess that risk as "probable". Agnico Eagle will continue to carry out monitoring and reporting of the TIA in accordance with the Water Licence, and if needed in future, would carry out the additional detailed analysis required to identify an appropriately engineered alternative mitigation measure.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-12**
Re:	**Patch 7 Contact Water Pond**		

Request Made by Interested Party:
Has AEM considered the potential for permafrost degradation around CWP4 and its potential impacts on the stability of the adjacent waste dump?

Agnico Eagle's Response to Request:
Agnico Eagle has considered permafrost in the design and use of CWP4. Agnico Eagle is confident that there will not be significant impacts on stability of the adjacent waste dump.

As described in the design report (Appendix 3-C), CWP4 will be operated in a manner that ensures the pond remains as dry as practicable during the summer season, removing a potential heat load in the pond. The adjacent WRSF will be developed to encourage permafrost development in the facility: freeze-back of the underlying foundation soils, and placement of thin layers of waste rock. Finally, the toe of the WRSF will be at least 16 to 20 m from CWP4.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-13**
Re:	**Patch 7 Contact Water Pond**		

Request Made by Interested Party:
Confirm that a thermal analysis of the proposed CWP4 has been undertaken to support the 30-day design drain down time and that storage of water in CWP4 for this duration will not have negative impacts on the surrounding permafrost.

Agnico Eagle's Response to Request:
Thermal analysis of CWP4 was not required for the design report (Appendix 3-C). As described in the design report, CWP4 will be operated in a manner that ensures the pond remains as dry as practicable during the summer season. The water stored in the pond should not exceed 30 days. By the end of the summer, the pond is expected to be dry. Once winter arrives, the permafrost will re-establish itself within the active layer surrounding CWP4. This is similar to all other contact water ponds at Hope Bay.

In addition to the above, Agnico Eagle will also monitor permafrost through thermistors installed along its eastern edge to monitor the ground temperature up to 2 m below the bottom of the pond.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-14**
Re:	**Contact Water Pond 4**		

Request Made by Interested Party:
Given CWP4 will be excavated into native ground, restoring natural drainage at closure may not be possible. Confirm the conceptual closure plan for the proposed CWP4 at Patch 7.

Agnico Eagle's Response to Request:
As described in the ICRP, the closure objective for ponds is:

- restore the natural drainage paths where possible
- prevent excessive erosion while ensuring that no long-term active care and maintenance is required

To achieve these objectives, options for decommissioning, breaching, or removing each of these structures will be evaluated on a case-by-case basis. For CWP4, closure options may include restoring draining, allow water to remain, or some other appropriate solution that will allow the closure objective to be achieved.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-15**
Re:	**Saline Pond 1**		

Request Made by Interested Party:

Given the SP1 will be excavated up to 21 m into bedrock, restoring natural drainage at closure may not be possible. Confirm the conceptual closure plan for the proposed SP1.

Agnico Eagle's Response to Request:

Please refer to the response in KitIA-NWB-14.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-16**
Re:	**Sediment Sample Depth**		

Request Made by Interested Party:

We recommend Agnico Eagle provide evidence that the top 2-3 cm of sediment are representative of the 3-year sampling interval. If this evidence is unavailable, we recommend Agnico Eagle investigate for each sediment sampling location to evaluate the depth of sediment that represents a 3-year interval and adjust the sampling protocols accordingly.

Note if sedimentation rates are substantially less than 1 cm / 3 years, a more refined sediment sampling method may need to be considered.

Note this concern applies both to sediment sampling within the freshwater environment as well as the marine environment.

Agnico Eagle's Response to Request:

Sediment sampling under the AEMP is consistent with the Environmental Effects Monitoring (EEM) Technical Guidance Document (ECCC 2012) and Agnico Eagle's AEMP studies in Nunavut. The upper 2–3 cm of sediment is targeted because it represents the most recently deposited and biologically relevant sediment horizon, where contaminants of concern and benthic organisms are most likely to occur.

Sedimentation rates vary among waterbodies and are influenced by multiple site-specific factors (Hakanson 2012; Sly 1978). Effluent is not currently deposited in freshwater lakes adjacent to the mine, and in the marine environment, effluent remains predominantly buoyant and is dispersed through tidal flushing. Accordingly, site-specific sedimentation-rate studies in neighbouring lakes or the marine environment are not warranted at this time.

Available sub-Arctic research indicates that sediment deposition rates can be very low and variable, ranging from approximately 20 to 60 years/cm (Crann et al. 2015). Targeting less than the upper 2-3 cm of sediment is unlikely to provide meaningful additional information for assessing potential effects to aquatic organisms since benthic organisms tend to exist in the upper 2-5 cm of sediment (ECCC 2012).

Finally, sediment quality has been monitored at the site within the AEMP since 1995 and no action levels have yet been triggered. Potential dust-related inputs are also addressed through ongoing site-wide air quality monitoring.

Citation:

Environment Canada. 2012. Metal Mining Technical Guidance for Environmental Effects Monitoring. Her Majesty the Queen in Right of Canada represented by the Minister of the Environment, 2012.

Hakanson Lars. 2012. Sedimentation Processes in Lakes. Research Gate. https://www.researchgate.net/publication/235631789_Sedimentation_Processes_in_lakes.

Crann, C.A., Patterson, R.T., Macumber, A.L., Galloway, J.M., Roe, H.M., Blaauw, M., Swindles, G.T., Falck, H. 2015. Sediment accumulation rates in subarctic lakes: insights into age-depth modeling from 22 dated lake records from the Northwest Territories, Canada. Quaternary Geochronology. 27: 131-144. DOI: 10.1016/j.quageo.2015.02.001

Sly, P.G. (1978). Sedimentary Processes in Lakes. In: Lerman, A. (eds) Lakes. Springer, New York, NY. https://doi.org/10.1007/978-1-4757-1152-3_3.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-17**
Re:	**Water Quality Sampling Frequency**		

Request Made by Interested Party:
We recommend the AEMP be adjusted to include an additional annual water quality monitoring event during or immediately following freshet, with the specific timing informed by health and safety considerations.

Agnico Eagle's Response to Request:
The current AEMP water quality sampling schedule includes two sampling events per year (April and August), designed to capture under-ice and open-water conditions at long-term stations in Aimaokatalok, Stickleback, Doris, Patch, Windy, and Wolverine lakes, and Reference Lake B. The MDMER EEM program further supplements this with four sampling events per year (April, July, August, and September) at Aimaokatalok Lake (Aim-EEM) and Reference Lake B, thereby capturing post-freshet conditions in freshwater Lakes; and in Roberts Bay exposure and reference areas capturing post-freshet marine conditions (Minnow, 2025).

Agnico Eagle is not proposing long-term storage or accumulation of saline or contact water as part of the water management strategy for the Operational Update; these facilities are intended for operational use prior to pumping to the next pond, to treatment, and final discharge. Potential risks due to overtopping during periods of intensive rainfall or snowmelt (e.g., freshet) have been mitigated through ongoing monitoring, and management outlined in the Doris-Madrid Water Management Plan (e.g., pumping to commence as soon as the containment volume is large enough for one continuous hour of pumping).

Potential surface runoff pathways to adjacent waterbodies, including those associated with dust deposition, precipitation, or snowmelt, will continue to be monitored and documented through the annual report process. This comment is considered resolved as the information will be provided through the regular annual reporting process.

Citations:
Minnow Environmental Inc. 2025. Agnico Eagle – Hope Bay Mine Phase 2 Environmental Effects Monitoring Interpretive Report (2025). Georgetown, ON

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-18**
Re:	**Roberts Bay Monitoring**		

Request Made by Interested Party:

We recommend Agnico Eagle provide an updated marine environment sampling plan as part of this application to provide confidence that sufficient monitoring of sufficient resolution will be conducted to confirm the predictions outlined in Appendix 4G are accurate.

Agnico Eagle's Response to Request:

Marine monitoring in Roberts Bay is conducted under the MDMER-EEM program, approved by ECCC, and is outside the NWB process. Updates to the marine monitoring program will be addressed through future EEM study designs, submitted six months before scheduled field work. Where a diffuser is added or relocated, additional exposure-area sampling will be proposed, and reference locations may be updated to ensure comparability with the new diffuser conditions. Once both diffusers are operational, additional plume delineation studies may also be completed to support monitoring station locations and evaluate hydrodynamic model predictions.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-19**
Re:	**Fish and Fish Habitat (Offset)**		

Request Made by Interested Party:
Please illustrate how fish passability/movement considerations contributed directly to each life functions in the HEP.

Agnico Eagle's Response to Request:
Fish passability and movement are considered in the Habitat Evaluation Procedure (HEP), included as Appendix 6-Q of the Water Licence Amendment application. These considerations are addressed in three ways:

- through the habitat unit calculation use of access weighting;
- through the assessment of effects on streamflow; and
- through the calculation of losses addressed in the Fisheries Offsetting Plan.

Habitat Unit
The HEP calculates habitat units (HUs) by applying the following inputs:

- the spatial area of the affected habitat type, such as square metres;
- the habitat quality for each of four life functions: spawning, nursery, foraging, and overwintering;
- each fish species included in the assessment; and
- applicable weighting factors, including species weight, life-function weight, access weight, and, where applicable, a habitat co-factor.

The access weight is assigned for each species/life function. It is scored as either 0 for no access or 1 for access. The score is based on known or suspected fish and fish habitat distributions in specific waterbodies, as described in baseline surveys completed between 1995 and 2025.

Each species and life function is assigned an access weight of 1 for any habitat that could potentially be accessed. This applies even where the species was not captured in that habitat during baseline surveys. This approach is conservative. It accounts for migration, passability, and fish movement to habitats that may be lost or altered as a result of the Operational Update.

Effect on Streamflow
Streamflow variation was used to determine which watercourses should be screened out and which should be retained for further assessment.

1. Watercourses were screened out where streamflow variation was less than 10% from baseline conditions. In these cases, little to no effect was expected.
2. Watercourses were retained for further assessment where streamflow variation was equal to or greater than 10% from baseline conditions.

2.1. A minimum flow threshold of 30% of mean annual discharge was used to identify periods of highest risk for fish and potential effects on habitat use.
2.2. The area of potential fish habitat loss was calculated using baseline fish habitat assessments and hydraulic model results.

Where modelled flows were less than 30% of mean annual discharge, potential effects were assessed in more detail. This included evaluating whether reduced streamflow velocity or depth could restrict fish migration for specific species or life functions. Where migration may be affected, habitat losses are calculated and carried forward to the Fisheries Offsetting Plan.

Fisheries Offsetting Plan

The Conceptual Fisheries Offsetting Plan also considers changes in the timing and duration of flow. This includes:

- delays in the onset of freshet;
- earlier onset of freeze-up; and
- resulting limitations on fish use, including migration and other life functions.

Habitat losses are calculated using the habitat area of the affected watercourses and the proportional reduction in the duration of the open water period.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-20**
Re:	**Fish and Fish Habitat (Offset)**		

Request Made by Interested Party:
Provide offsetting measures for the 8 water courses that are impacted due to operational updates.

If not offsetting, provide explanation and related implications for not providing offsetting fish habitats for the 8 watercourses.

Provide explanation and rationales for changes in the current offsetting plans in relation to no habitat gains/offsets for the 8 water courses that are impacted from previously submitted offsetting plan (ERM 2018).

Agnico Eagle's Response to Request:
Agnico Eagle confirms that offsetting measures for the 8 watercourses that are impacted from the Hope Bay Operational Update are provided in Appendix 6-Q (Conceptual Fisheries Offsetting Plan) of the Water Licence Amendment application. The proposed offset involves habitat development in both pond and stream habitat in the Iqaluktuuttiaq East Outflow System (EOS). Examples of offsetting works in stream habitat from the proposed offsetting measure are as follows:

- Enhancement or remediation of a fish passage impediment at eight culverts at the EOS crossing along the main access road to Ovayok Territorial Park
- Connector channel modifications at the inlet of Pond 3 and the outlets of Pond 3 and 4a in the EOS
- The creation of riffle habitat at the outlet of Pond 5 in the EOS resulting in habitat creation and improved connectivity through backwatering

Agnico Eagle reiterates the Conceptual Fisheries Offsetting Plan and the proposed offset (EOS) have been carried forward from one of the offsetting options identified in the 2017 Madrid-Boston FEIS Conceptual Offsetting Approach (2017 FEIS, Appendix V5-6AA). The proposed offset has been continuously discussed through engagement opportunities that have included the Kitikmeot Inuit Association (Appendix B of Appendix 6-Q) and is in line with relevant DFO policy and Frameworks (See response to KitIA-NWB-21).

Agnico Eagle will continue to develop the Conceptual Fisheries Offsetting Plan towards finalization through the appropriate ensuing regulatory processes with DFO, including a Request for Review and anticipated *Fisheries Act* Authorization process.

Interested Party:	**KitIA**	**Rec No.:**	**KitIA-NWB-21**
Re:	**Fish and Fish Habitat (Offset)**		

Request Made by Interested Party:

Provide offsetting measures specifically for Lake Trout and Slimy Sculpin that are impacted in Table 3.5 of Appendix 6-Q. Habitat units for 242 Lake Trout, and 964 Slimy Sculpin are impacted due to operational update and water withdrawals.

If not offsetting for these two species, provide scientific rationales for omitting offsetting plans for Lake Trout and Slimy Sculpin.

Or provide justifications that offsetting for other fish species and/or overall productivity compensates for these species losses.

Agnico Eagle's Response to Request:

Agnico Eagle reiterates that the objective of offsetting is to achieve no net loss in fisheries productivity, while aligning with relevant DFO Policies and Frameworks. It is common practice to develop offsetting projects where productivity gains for only one species of interest are used to offset losses to several species (e.g., the Pistol Bay Falls Arctic Charr offsetting program for the Meliadine mine); it is rare (if ever) where an offsetting project is developed to account for losses in each individual species, apart from Species at Risk. Further, Slimy Sculpin was not identified as a VEC for the Hope Bay Complex.

The proposed offset in Appendix 6-Q of the Water Licence Amendment application is aligned with relevant DFO Policy (i.e., *Policy for Applying Measures to Offset Harmful Impacts to Fish and Fish Habitat*) and Frameworks (i.e., *Framework to Identify Fish Habitat Restoration Priorities*) and will provide a net gain in fisheries productivity.

The proposed offsetting measure has been identified and developed with input from DFO, the KitIA, and the Hope Bay Inuit Environmental Advisory Committee (IEAC). These parties were included in engagement on the offsetting plan that has been conducted from 2017 to 2023, with engagement to continue in 2026 (Appendix A of Appendix 6-Q).

Agnico Eagle will continue to develop the Conceptual Fisheries Offsetting Plan towards finalization through the appropriate ensuing regulatory processes with DFO, including a Request for Review and anticipated *Fisheries Act* Authorization process.

CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC)

PREAMBLE

Agnico Eagle submits these responses from the position of an experienced, responsible, and well-established operator (founded in 1957, Canadian-based and led), with a long history of regulatory engagement and compliance in Nunavut (acquired Meadowbank in 2007, Meliadine in 2010), and at Hope Bay (acquired in 2021).

Hope Bay is not a new site. It is a previously assessed, previously approved, and actively regulated mine with existing infrastructure, approved management plans, and ongoing monitoring, inspection, and reporting requirements that continue to be implemented through the current Water Licence and annual regulatory processes.

The Operational Update is best understood as an optimization and refinement of the approved Hope Bay Mine, rather than a new project or a new type of activity. Mining, milling, waste rock management, tailings deposition, water management, and closure remain activities previously permitted under the Water Licence and approved for the Hope Bay Mine.

Monitoring data, annual reports, monthly reports, geotechnical inspections, and Board-approved plans are already in place and continue to provide transparency and accountability for existing site activities. The Water Licence Amendment Application is focused only on facilities that are impacted by the changes: there are many existing facilities at site that will not be impacted by the proposed changes and will continue to operate exactly as permitted previously. As these facilities are not being amended or changed in any way, and will continue to operate as previously approved, they are not included in the amendment application.

Included with the submission to the NPC, Agnico Eagle completed a NuPPAA screening and provided a legal opinion document (Lawson 2025). The NPC determined that the amendment is not a significant modification (see Appendix 2-A of the application), and referred the amendment application directly to the NWB for processing as an amendment to the Water Licence.

The NWB has jurisdiction over procedural matters under the Nunavut Agreement and the Act. The NWB has determined that the amendment application meets the requirements of applicable NWB guidance as it applies to our application, and has determined the application is administratively complete. On May 7, 2026, the NWB also issued clear guidance that information should only be included in the amendment application on facilities and activities that are changing. Existing unchanged activities and infrastructure are not to be part of the amendment application. This is understandable from an administrative perspective, as this approach supports all parties to focus their review on the amendments. This approach acknowledges the comprehensive public registry maintained by the NWB which provides information going back decades that culminated in the infrastructure that is present at the Hope Bay mine, which is readily available to any individual reviewer that is curious about project history.

The Company has filed the relevant application materials, responded to information requests, provided clarifications where warranted, and identified those instances where plan updates will appropriately follow the conclusion of the amendment process, consistent with standard NWB licensing practice, and the NWB has validated that this is the correct procedural approach in the case of this amendment.

Accordingly, the focus of this licensing process should remain on the core substantive topics in this amendment application (as the NWB has directed in its procedural role), rather than on aspects that are unrelated to the amendment and have already been approved, monitored, and reported on through the comprehensive NWB process and applicable legislation, which CIRNAC and other reviewers fully participated in. This is especially crucial given the importance of the restart of the Hope Bay Project to Canada, Nunavut, the Kitikmeot Region, and Nunavummiut.

Citation:

Lawson (Lawson Lundell LLP). 2025. Legal Opinion regarding Regulatory (Nunavut Impact Review Board and Nunavut Water Board) Requirements to proceed with Hope Bay Operational Update. Submitted to Agnico Eagle Mines Limited. July 9, 2025.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-01**
Re:	**Quality Of Water Sources**		

Request Made by Interested Party:

CIRNAC recommends that the Nunavut Water Board ensure that the proponent provide a description of the quality of water source(s) and the available capacity, and 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), in the format prescribed by the NWB guidelines, to support assessment of baseline conditions and potential project effects.

CIRNAC also recommends that the Nunavut Water Board ensure the licence conditions require long-term, seasonally representative water quality monitoring of freshwater sources impacted by project activity over the life of mine—including construction, operations, and the full term of the licence—to support ongoing evaluation of baseline conditions and potential project-related effects.

Agnico Eagle's Response to Request:

The reader is referred to the CIRNAC Preamble of this response package for overall comments related to guideline, assessment, previous determination, and scope.

With respect to the first item, the NWB already required previous licence holders to provide this information, and has confirmed that relevant historical information on the NWB public registry is sufficient. No new information is required to describe baseline conditions as these were already fully considered in previous applications. The potential effects specific to the amendment are already part of the application – the NWB does not require Agnico Eagle to provide a summary of project effects in relation to activities and infrastructure that is not changing, as this is well covered by the existing monitoring and reporting conditions of the Water Licence.

Similarly, the NWB has already considered the question of freshwater monitoring, and has included stringent terms and conditions in the Water Licence that address these items. Agnico Eagle will continue to comply with these terms and conditions and is not proposing to change any of these existing requirements as part of the amendment application.

A response is provided; however, it appears that the technical comment is not linked to the scope of the application.

- *"…to support assessment of baseline conditions and potential project effects"*
    - Water quality data has been collected seasonally since 1995, and where applicable has been incorporated into the AEMP.
    - There is a robust water quality data set for the Hope Bay file, and monitoring will continue as per the AEMP to support this application.
    - Monitoring data is used to evaluate against predictions.

  - As described in the AEMP, monitoring data (in the receiving environment) is compared to generic guidelines with triggers and thresholds to determine when a Response Framework is required.
  - "The primary goals of the AEMP described by the Plan are to evaluate potential Mine effects on the surrounding freshwater environment during the construction and operation of the Mine".

- "*recommends that the Nunavut Water Board ensure the licence conditions require long-term, seasonally representative water quality monitoring of freshwater sources impacted by project activity over the life of mine—including construction, operations, and the full term of the licence—to support ongoing evaluation of baseline conditions and potential project-related effects"*
  - Agnico Eagle confirms we are in compliance with the Conditions of our licence.
  - As per Part I, Item 1, Agnico Eagle implements the AEMP and reports annually.
  - This is the long-term monitoring program and is effective for all phases of the mine life.
  - Additional information is provided in KitIA-NWB-17.
  - The AEMP is a robust program, but minor updates will be made (ECCC-TRC-2, ECCC-TRC-3)

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-02**
Re:	**Discharge Criteria**		

Request Made by Interested Party:
CIRNAC recommends that the Nunavut Water Board include within the Licence the full suite of relevant and current CCME freshwater quality guidelines applicable to project discharges to ensure continued protection of the receiving environment under the proposed amendment and renewal conditions.

Agnico Eagle's Response to Request:
Agnico Eagle does not agree with CIRNAC's request. As NWB is aware, CCME guidelines were not designed as discharge criteria for industrial projects. Use of CCME or other generic guidelines for discharge criteria is not appropriate. The NWB took the CCME guidelines and other relevant guidelines and requirements (including the MDMER) into account and followed a rigorous process in establishing the discharge criteria currently in place under Part F of the Water License. There is no evidence to suggest based on monitoring and reporting established under the current Water Licence that any of these criteria should be changed. Agnico Eagle will continue to comply with the discharge criteria established under Part F of the Water Licence and does not agree that any of these criteria should be amended at this time.

Generic (CCME) guidelines are already included in the AEMP. Per response to ECCC-TRC-3, Agnico Eagle will take into consideration the relevant CCME guidelines in future AEMP updates.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-TRC-03
Re:	Summary Table of Expected Quality and Quantity of Water and Adaptative Management Criteria		

Request Made by Interested Party:
CIRNAC recommends that the Nunavut Water Board ensure that the proponent provides 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, in the format required by NWB Guidelines.

Agnico Eagle's Response to Request:
Agnico Eagle does not agree with CIRNAC's request; as there appears to be confusion between the amendment application process with the ongoing annual monitoring and reporting processes under the Water Licence, which are separate and occur in parallel. The reviewer referenced a comment from the 2025 Site-Wide Geotechnical Report (Appendix J1 from the 2025 Annual report), but did not review the recommendations and implementation plan (Appendix J3 from the 2025 Annual Report) that described the action plan and follow-up. Agnico Eagle confirms it takes seriously the annual geotechnical inspection and follow-up items to ensure that the infrastructure performs as designed and installed, and will continue to address this specific item as needed in the annual reporting process. However, this particular item has limited relevance to this amendment application.

In regards to the recommendation, again, the NWB has already previously taken this action on previous applications which were approved by the NWB and has not asked for additional information on any of the previously approved sumps, monitoring stations, discharges, etc. that are subject to approved NWB plans. Specific to this amendment application, Agnico Eagle has provided predictions of untreated water quality and quantity of all relevant discharge points (Appendix 4-F, Water and Load Balance Report). The final discharge point is the important area for annual review of data and predictions. All water upstream of the final discharge point will managed as described in the NWB-approved Water Management Plan. The upstream locations (sumps and ponds) will be managed by the Agnico Eagle team in accordance with the applicable NWB-approved to confirm the system is working as designed, and if necessary, will implement mitigations in accordance with the modification provisions of the Water Licence as applicable to the specific mitigation.

From a water balance perspective, modelling indicates all existing infrastructure will be appropriate to managing expected flows and volumes. There are many aspects of the site that are unchanged by the amendment – an increase in production does not translate to an increased usage of all infrastructure currently in place at Hope Bay.

From a water quality perspective, modelling of untreated water indicates that concentrations of contaminants at Hope Bay will continue to be low and within treatable ranges. Agnico Eagle has high

confidence in the modelling provided with the amendment application. Hope Bay Mine water quality is predicted to be consistent, particularly due to Agnico Eagle's intent to separate between saline (underground) and non-saline (TIA) streams. Should they be necessary, water treatment systems are designed appropriately to treat constituents prior to discharge to the environment and provide an additional level of certainty that Water License discharge limits will continue be met.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-04**
Re:	**Method(s) Of Extraction And Operating Of Pump(s)**		

Request Made by Interested Party:
CIRNAC recommends that the Nunavut Water Board ensure that the proponent provides a description of the method(s) of extraction and a description of the operating capacity of the pump(s) used to support assessment of potential impacts associated with increased water withdrawals and evolving operational conditions.

Agnico Eagle's Response to Request:
The technical comment relates to existing approved infrastructure and activities that are not impacted as a result of the application and so is not linked to the scope of the application.

As noted previously in response to CIRNAC-IR-01 (see response packages from April 9 and 24, 2026):

- The extraction methods for existing intakes do not change from the current Licence and have been proven to be effective through many years of operational experience and monitoring.
- Agnico Eagle has confirmed that existing infrastructure does not need to be changed for the Operational Update.
- For future intakes, the extraction methods will be similar to existing methods, and per current practice, details will be provided in a 60-day notice to the NWB (Part D, Item 1 of the Water Licence), and where applicable, in a Request for Review to DFO

Finally, total water extraction in a calendar year is provided in the Annual Report; all historic and future water extraction has been and will be in compliance with the total annual use as per the Water Licence. Should the reviewer be interested in this project history despite its limited relevance to the amendment application, we invite you to review the annual reports available on the NWB public registry.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-05**
Re:	**Water Management Infrastructure Information**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent provide complete information regarding:

a) Existing storage reservoirs;

b) Watercourse crossings including pipelines, bridges, culverts or roads;

c) Watercourse trainings including channel and bank alterations, culverts, spurs, erosion control, and artificial accretion;

d) Diversions including ditches and dikes and their purposes.

Agnico Eagle's Response to Request:

Agnico Eagle does not agree with CIRNAC's continued request to provide this information, as this information was all reviewed and approved as part of previous licence applications. NWB staff have indicated that all parties can rely on the registry and Agnico Eagle is respectful of that decision. Per the preamble to this section, it would be duplicative and confusing to add hundreds of pages to an application repeating things that are already part of the procedural record and included on the NWB public registry, that have been approved for continued use.

The NWB has already specifically determined the requested information is not required, and that this approach aligns with the NWB guidelines. We would like to highlight the following key passage of the NWB's May 7 letter, as it directly relates to the topic of requests for information on current licensed activities and infrastructure that are not changing as a result of the proposed amendment:

> *"With respect to CIRNA's position specifically about requiring submission of information and updates in relation to existing and previously approved activities/infrastructure, the Applicant has identified in the Amendment Application that many previously approved activities/infrastructure will remain unchanged. If no changes to previously approved activities/infrastructure are requested, the NWB does not require resubmission in the Amendment Application of information that is already on the public registry for the Licence such as technical information from the original applications and renewals, monitoring information and previously approved plans,etc."*

In this passage, the NWB was very clear that Agnico Eagle is not required to resubmit information about our project that is already approved and not proposed to change, particularly given that information is already on the NWB registry.

In its letter, the NWB went on to state that:

> "*The Board highlights, however, that the onus remains on the Applicant to provide the Board and parties with sufficient information to support their requested amendments to the existing Licence. For example, if the Applicant, during technical review of the Amendment Application determines*

> *that significant changes to the existing/previously approved activities/infrastructure are required, the Board retains the discretion to request additional information and suspend the Board's consideration of the Amendment Application until sufficient information and technical review of the information necessary to support such requests is made."*

Again, the Board is very clear in its May 7 letter that it is only significant changes to the existing/previously approved activities/infrastructure that requires Agnico Eagle to submit additional information. The information that CIRNAC continues to seek is on project aspects that Agnico Eagle has confirmed are not changing. The paragraph above indicates that additional information is only required by the NWB where Agnico Eagle is seeking changes. The NWB have determined that the SIG has been complied with to the extent it is relevant to this particular application.

With respect to CIRNAC's comment that, "*The Hope Bay Project has undergone multiple amendments and renewals throughout its lifespan. Under earlier licenses, processes, life of mine, camp size, water need, environmental conditions and production rate at the mine site may be substantially different. For example, the mine was originally only intended to have a two year production life in 2006, with an extended mine life of 4-6 years approved in 2011*." The CIRNAC reviewer does not reference the 2018 amendment, which extended the licence until 2035 (NWB Registry). Again, this comment is only relevant to this amendment application to the extent that Agnico Eagle is proposing to change previously approved infrastructure and activities. It is incorrect to assume the changes proposed by the amendment application impact each of the listed topics. The water licence amendment process does not "re-assess" previously approved project components that are not impacted by the amendment application.

Much of the existing water management infrastructure—including reservoirs, contact water ponds, watercourse crossings, culverts, and diversion structures—have been in place and have been inspected by CIRNAC and parties such as KitIA on a regular basis since they were approved over a decade ago. The reviewer's underlying assumption that the primary design assumptions of these structures is driven by mine life and production rate is false. As previous proponents have emphasized, Hope Bay is envisioned as a multi-generational project and using conservative assumptions were designed for long term use. Agnico Eagle confirms it will continue to operate all existing infrastructure as approved, whether or not that infrastructure is affected by the amendment.

Existing water crossings and access infrastructure were designed using conservative assumptions, and Agnico Eagle confirms no changes to this infrastructure are required in order for the amendment to proceed.

With respect to the reviewer's suggestion that, "*the increase in mine activity might bring added weight and wear and tear on water crossing infrastructure due to the use of potentially heavier machinery and more frequent travel than what was assumed when they were originally designed and approved*," the Type A Water Licence ongoing monitoring and inspection requirements already address and mitigate this risk.

Agnico Eagle is required to keep water crossing infrastructure in good working order, and as CIRNAC's own inspections confirm, it has done so.

Similar to other comments, the background context for this comment appears to confuse the role of ongoing monitoring and annual reporting under the Water Licence and this amendment process. With respect to the Doris Contact Water Pond, see the 2024 geotechnical inspection, which confirms, "The Doris Contact Water Pond tie in remains frozen and does not show notable signs of warming based on GTC data" (NWB Registry). Per the most recent Annual Report (2025), monitoring confirms this facility continues to function as designed (NWB Registry). Agnico Eagle confirms no changes are required to this infrastructure in order for the amendment to proceed and this facility is therefore not relevant to this amendment application.

Agnico Eagle has not identified any material changes needed to current reservoirs or storage ponds in order to proceed with the amendment application. Again, recent geotechnical inspections have not raised any significant concerns. However, if a modification were needed to any of this infrastructure in the future, Agnico Eagle would follow the established Type A Water Licence modification process which includes notification and an opportunity for comment by CIRNAC reviewers.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-06**
Re:	**Prediction Of Climate Trends**		

Request Made by Interested Party:
CIRNAC recommends that the Nunavut Water Board ensure that the proponent provides a description of the predicted future climate trends at the project site, including worst-case scenario projections using the Intergovernmental Panel on Climate Change's Shared Socioeconomic Pathway – Representative Concentration Pathway 5-8.5.

Agnico Eagle's Response to Request:
This information has been provided, to the extent relevant to the amendment application.

Agnico Eagle used climate scenario SSP2-4.5 to model water quantity and quality predictions for this Water Licence Amendment application. Engineering design must balance environmental protection, technical performance, and proportionality. Designing operational water management infrastructure based on an upper-bound climate scenario extending well beyond the operational life could result in larger facilities, increased land disturbance, and a larger project footprint without demonstrating a corresponding environmental benefit. As such, infrastructure should be designed using climate assumptions that are appropriate and fit-for-purpose for the operational period being assessed. However, to evaluate the sensitivity of the modelling results to climate scenario selection Agnico Eagle completed a sensitivity assessment comparison between climate scenarios SSP2-4.5 and SSP5-8.5 and concluded that there are no material differences between the scenarios within the modeling timeframe. This is summarized in the table below that demonstrates the volumetric differences between the two climate scenarios. This is consistent with Agnico Eagle's understanding of the SSP models where they only begin to appreciably diverge in the 2060's. Therefore, all SSP models are considered the same for the duration of the modelling timeframe, and SSP5-8.5 is not any more conservative than SSP2-4.5.

Finally, Agnico Eagle incorporates climate change in the detailed engineering of water management infrastructure. As described in CIRNAC-TRC-18b, Agnico Eagle includes short-term flooding scenarios into the design of infrastructure. These design reports are reviewable through the 60-day notice application.

Year	Flow		% Change
	SSP2-4.5	SSP5-8.5	
Y0	713,800	721,500	1.1%
Y1	766,500	779,600	1.7%
Y2	845,500	826,000	-2.3%
Y3	827,500	828,000	0.1%
Y4	899,500	895,100	-0.5%
Y5	910,000	922,500	1.4%
Y6	953,100	953,500	0.0%
Y7	947,800	941,200	-0.7%
Y8	980,500	981,000	0.1%
Y9	1,025,500	1,023,400	-0.2%
Y10	253,300	256,400	1.2%
Y11	287,400	287,400	0.0%
Y12	285,400	284,400	-0.4%
Y13	283,900	286,000	0.7%
Y14	42,500	38,200	-10.1%
		Overall % Difference:	0.02%

Saline Discharge

Year	Flow		% Change
	SSP2-4.5	SSP5-8.5	
Y0	1,568,700	1,577,800	0.6%
Y1	1,559,500	1,586,900	1.8%
Y2	1,979,000	2,024,600	2.3%
Y3	2,334,700	2,353,000	0.8%
Y4	2,243,500	2,316,500	3.3%
Y5	1,897,000	1,933,400	1.9%
Y6	1,787,500	1,869,600	4.6%
Y7	1,550,400	1,605,100	3.5%
Y8	1,067,000	1,067,000	0.0%
Y9	1,039,700	1,067,000	2.6%
Y10	1,012,300	1,048,800	3.6%
Y11	1,003,200	1,039,700	3.6%
Y12	994,100	1,067,000	7.3%
Y13	975,800	1,003,200	2.8%
Y14	948,500	975,800	2.9%
		Overall % Difference:	2.62%

TIA Discharge

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-07**
Re:	**Ice Road**		

Request Made by Interested Party:
CIRNAC recommends that the Nunavut Water Board ensure that the proponent indicates the quantities of water required for ice road construction and provides a description of the methods of ice road construction, monitoring and safety.

Agnico Eagle's Response to Request:
The technical comment relates to existing approved infrastructure and activities that are not impacted as a result of the application and so is not linked to the scope of the application. The details are provided for the readers information. Ice road volumes will continue to be subject to the overall water use limits established by the Water Licenses. Agnico Eagle confirms it will continue to operate within these overall Water Licence limits.

Winter ice road construction, and the use of proximal sources for water to construct these roads, was added to the Licence during the 2018 Water Licence Amendment. It is not a new scope within the current application and there are no changes triggered by this amendment application. As per the 2018 Water Licence Amendment, a request was made under Part E to include a volume for winter ice road or winter track construction. The history is outlined in 2018 Water Licence Amendment Hearing Transcripts. As was communicated and approved in 2018, Agnico Eagle will continue to follow the same use.

> *"So, commonly, what TMAC has been doing under our exploration licences is we build tracks over top of lakes that don't actually require necessarily water use or ice, and similarly over the tundra, it's often adequate to just compact the snow, and we call that a track. But in some cases, yes, we would need to use water for -- to create ice for the road. So we've used the language of an "ice road", but in reality, it may require -- it may not require water use."* (Volume 2, Hearing Transcript, page 213)

> *"So in response to your question, Karén, for the Doris-Madrid Water Licence, we would estimate that, on any given year for the construction of winter ice roads, that 60,000 cubic metres [per year] would be required, mainly driven by construction of the all-weather road, which is captured under the Doris-Madrid licence, and for Boston, the estimated water use would be substantially less, at 20,000 cubic metres of water to be held under the "B" for the construction of winter ice roads."* (Volume 2, Hearing Transcript, page 231-232.)

As outlined above, the main driver behind the request in 2018 Water Licence Amendment was to support the development of the Madrid-Boston all-weather road. To construct infrastructure, winter ice roads or winter tracks will be used to facilitate staging activities during construction. Proximal sources in this case would utilize sources close to the road development. The Madrid-Boston all-weather road is an approved activity.

Agnico Eagle does develop winter ice road / winter tracks for exploration purposes. As presented in past Annual Reports, Agnico Eagle has drawn from Patch Lake as a proximal source over the past years to support exploration around Patch Lake. The numbers were below the total annual Water Licence allowance of 60,000 m^3 (e.g., in 2025 – 14,719 m^3; 2024 – 37,026 m^3; 2023 – 5820 m^3). Agnico Eagle will continue to report its water use annually, as per the Licence conditions.

Again, this is an approved scope item and condition in the licence that is not being amended as part of this Application. Agnico Eagle will follow the conditions of the Licence and DFO protocols for the extraction of water. The reader is referred to DFO-TRC-02 for additional information.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-08**
Re:	**Management Plans**		

Request Made by Interested Party:
CIRNAC recommends that the Board ensure that the Proponent provides complete information in accordance with NWB guidelines Guide 7 and Guide 4, to support the assessment of potential impacts to water resources regarding:

a) *An updated water management plan that demonstrates consistency between the text and its flow diagram;*
b) *A Spill Contingency Plan, a Dam Emergency Plan, and an Emergency Response Plan to address all phases of the project including construction, operation, and care & maintenance.*

Agnico Eagle's Response to Request:
The reviewer requested management plans that reflect current and proposed site conditions, and to clearly distinguish between mining phases. Normal practice is to provide plans reflective of the current phase and then update plans (sometimes annually) to reflect updates to site conditions (2AM-DOH1335, Part B, Item 13; Schedule B, Item 7).

In addition, updated management plans were included as part of the initial submission. It is expected that parties will review those plans and provide questions where information was unclear, or request edits to be made in future versions of the plans (e.g., ECCC-TRC-07, ECCC-TRC-08). As shared with CIRNAC during the April 9, 2026 response to comments, June 4-5, 2026 and June 16, 2026 meetings, it is normal course and expected that an update to the water management plan will be required following the completion of the Water Licence Amendment. This is to ensure that all technical comments are captured appropriately and avoid duplication. This is a consistent and accepted practice followed through NWB Water Licence Amendments. There are many examples of this approach being applied by NWB in the past. Thus, Agnico Eagle commits to updating the Water Management Plan 60 days from Minister approval of the Water Licence Amendment.

Response to bullet a)
As was provided in our responses on June 18, 2026 to CIRNAC (Attachment A), a summary of proposed revisions and notes are provided in Table 1 below.

Response to bullet b)
Again, Agnico Eagle confirms that updates to the Spill Contingency Plan and Emergency Response and Crisis Management Plan will be completed to reflect construction, operation, and care and maintenance, where needed, as the project advances and will be submitted based on the conditions of the Licence. A key message is that Agnico Eagle operates under a plan that is reflective of the current project status, reviews its plan on a regular basis, and submits updates to the NWB for review at the appropriate times, in accordance with Water Licence requirements.

As part of the amendment application, Agnico Eagle submitted relevant updates to Emergency Response and Crisis Management Plan (Appendix 6-C of application) and Spill Contingency Plan (Appendix 6-M of the application). For example, in the Spill Contingency Plan (Appendix 6-M, Plate A.2; pdf pg. 60) notes that additional fuel may be added (as per the scope activity of the Water Licence Amendment) and that the plan would be updated accordingly at that time. Thereby acknowledging updates will be required when infrastructure is in place.

In addition, and in response to specific technical edits raised by ECCC (ECCC-TRC-07, ECCC-TRC-08), Agnico Eagle has committed to make minor updates to the next version of the Emergency Response and Crisis Management Plan (Appendix 6-C of application) and Spill Contingency Plan.

Table 1: Summary of Changes for Updates to the Water Management Plan

IR No.	WMP Section No. and Title	Comment/Note	Current Text	Update to be Implemented following Issuance of the Water Licence Amendment
17a	3.1.3.1. Operation	Flow is always through Saline Pond 1, then through treatment and discharge to Roberts Bay. This has been clarified in the text.	Mine water (water that is pumped or flows out of underground workings) will be collected in underground sumps and pumped to surface, from where it will be treated and discharged to Roberts Bay, either directly, or via Saline Pond 2.	Mine water (water that is pumped or flows out of underground workings) will be collected in underground sumps and pumped to surface, from where it will be treated and discharged to Roberts Bay, via Saline Pond 1.
17b		Water used in the mill (i.e., process water) is sourced from the Reclaim Pond and Doris Lake. It is then discharged to the TIA, as depicted in the process flow diagram. Water sourced from Doris Lake is not process water and is considered fresh water prior to entering the process plant.		No change required in Plan
17c	3.2.3.1. Operation	Clarification added to text. Note that the Doris Sediment Control Pond will be renamed to CWP 1A in the next revised WMP. Change in nomenclature is intended to standardize pond notation.	The CWP 2 will always be operated in a manner allowing pumping to commence as soon as the containment volume is large enough for one continuous hour of pumping. All water will be transferred to the TIA.	The CWP 2 will always be operated in a manner allowing pumping to commence as soon as the containment volume is large enough for one continuous hour of pumping. All water will be transferred to the TIA, via Doris CWP 1A.
17d	3.2.5. Sumps	Correction made to clarify that Sump 1 is upstream and not downstream of CWP1	Sump 1 is constructed downstream of the Sedimentation CWP 1, downstream of the south-east corner of the facility.	Sump 1 is constructed upstream of the CWP 1A, downstream of the south-east corner of the facility.
17e	3.2.6.1. Operation	CIRNAC's interpretation of the text is incorrect. The text in section 3.2.6.1 reads that process water, in excess of what is required in the process plant, may be discharged to Roberts Bay from the TIA. Flow stream cited by CIRNAC showing flow from the TIA to the process plant is reclaimed water being pumped back to the process plant.		No change required in Plan
17f	3.2.8.1. Monitoring	CWP 1A is the intermediary pond designed to reduce sediment and polish water sent to the TIA. Therefore, all flows from contact water sources are routed through this sediment control pond prior to going to the TIA.		No change required in Plan
17g	3.2.11. Various Use Containment Sumps	CWP 1A is again the intermediary pond designed to reduce sediment and polish water sent to the TIA. All flows from contact water sources are routed through the sediment control pond prior to going to the TIA.		No change required in Plan

IR No.	WMP Section No. and Title	Comment/Note	Current Text	Update to be Implemented following Issuance of the Water Licence Amendment
17h	4.1.3. Mine Water	Noted.		Process flow diagram will be updated to show potential for inflow from Windy Lake to Madrid, as an option.
17i	4.1.5. Treated Sewage Water	The Water Management Plan is intended to depict current conditions, describing water management infrastructure and strategies/methods for managing water today. The Water Licence Amendment Application depicts a scenario to demonstrate the upper bound water balance and water quality performance of the site. Some of these components may or may not be realized during actual operation of mine. The Water Management Plan will then be updated accordingly when these components are to be integrated into the system. For the time being, Agnico Eagle does not have a camp at Madrid and sewage water is trucked to Doris. However, if Agnico Eagle chooses to construct a camp (up to 250 occupancy) in Madrid, subsequent sewage treatment plant will also be constructed as depicted in the process flow diagram.		No change required in Plan
17j	Table 4-1		Sump 1	Sump 3
17k	Table 4-1	Naming convention clarified as Madrid North contains a north and south WRSF, each separate from one another.	Sump 1	Sump 5
17l	Table 4-1	Naming convention clarified as Madrid North contains a north and south WRSF, each separate from one another.		Sump 1
17m	Table 4-1	Currently, water reports to CWP3 until the pipeline connecting Doris and Madrid mine sites is commissioned, when it is possible to directly pump to the TIA.		No change required in Plan
17n	Figure 1 Water management Flow Diagram – Doris and Madrid	Note that many of the infrastructure referenced in this comment are not yet approved by the NWB, and are part of this Water Licence Amendment. For example, ponds not currently permitted include CWP4, Sump 6, CWP5, and CWP6. Once approved and constructed, these infrastructure will be added to the Water Management Plan body and the descriptive text will also be updated accordingly.		No change required in Plan

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-09**
Re:	**Outstanding Information Requests With Commitment From Proponent**		

Request Made by Interested Party:

CIRNAC recommends that the Nunavut Water Board request clarification from the Proponent on the status of commitments made during the June 4–5 working group and inquire whether responses to IR-08c, IR-14, IR-25, IR-37a, and IR-37b will be provided.

Agnico Eagle's Response to Request:

Agnico Eagle confirms clarification of commitment status was provided directly to CIRNAC on June 18, 2026. The response package included responses to IR-08c, IR-14, IR-25, IR-37a, and IR-37b. For the NWB's reference, these responses are provided in Attachment A.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-10**
Re:	**Tailing Volume Comparison and Reconciliation to FEIS**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Provide a clear comparison of previously assessed/authorized maximum mined quantities and tailings quantities in comparison to the proposed amendment;*
b) *Provide a technical analysis supporting the conclusion that the 90% increase in mining and tailings quantities relative to the assessed and approved project remains within the previously assessed envelope*

Agnico Eagle's Response to Request:

The Water Licence amendment process seeks approval for amendments to the TIA that will ensure the most efficient use of that facility.

For details of the anticipated volume of tailings that could be accommodated within the TIA using the tools described in the amendment, see response to KitIA-NWB-05 which details the TIA storage capacity.

See also KitIA-NWB-10, which provides further background on transition from slurry to dry-stacked/filtered tailings.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-11**
Re:	**Waste Rock Quantities and Mining Area Reconciliation to FEIS**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Provide a reconciliation of total mined tonnes and waste rock volumes relative to FEIS assumptions;*
b) *Confirm that all mining areas remain within previously assessed spatial limits or quantify expansions;*
c) *Identify whether the amendment represents an increase in total material mined or a change in sequencing/throughput only; and*
d) *Demonstrate that associated geochemical and water management impacts remain within previously assessed bounds.*

Agnico Eagle's Response to Request:

Response to bullet a, b, c)

As noted in response to KitIA-NWB-05, and referenced in CIRNAC-TRC-10, the focus of the Operational Update is on engineering/activity modifications to restart the Hope Bay mine.

As currently approved under the Water Licence, future WRSFs will be designed and operated to minimize the impact on the environment in accordance with the stringent terms and conditions established by the NWB. As per Part D, Item 1 of the Water Licence, detailed design reports will be submitted 60-days prior to construction, and facilities will be managed as per the Waste Rock, Ore, and Mine Backfill Management Plan, to be updated as required.

The original expected footprint for the Hope Bay Belt project is 1,694 ha, and the total area of the Operational Update Project Development Area (PDA) is 229 ha (Agnico Eagle 2025).

Response to bullet d)

As outlined in the main submission document of the Operational Update application, the predicted geochemistry and water management effects are generally consistent with those presented in the 2017 FEIS.

With respect to rock geochemistry, the 2017 and 2024 datasets show comparable results. Specifically, 99.5% of waste rock samples in 2017 and 98% in 2024 were classified as non-PAG. Similarly, 85% of ore samples in 2017 and 60% in 2024 were classified as non-PAG (Section 4.1.1 of the Main Application Document).

For water management impacts, a comparison of 2017 and 2024 release rates indicates consistent results across both studies. Specifically, waste rock release rates are comparable between the two datasets, although 2017 values were slightly higher for sulphate, arsenic, cobalt, and nickel. Release rates for ore are generally similar between 2017 and 2024 (Section 4.1.1 of the Main Application Document).

Citation:

Agnico Eagle (Agnico Eagle Mines Limited). 2025. Re: Request for Confirmation of Previous Conformity Determination for the Hope Bay Belt for the Hope Bay Operational Update. Submitted to Nunavut Planning Commission. October 23, 2025.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-12**
Re:	**Life of Mine (LOM) Reconciliation with Increased Throughput**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) Provide the LOM (years) associated with the amended mine plan;

b) Provide a comparison to the LOM assessed in the FEIS;

c) Reconcile total tonnes mined under the amended plan with FEIS assumptions; and

d) Describe implications for cumulative water use and discharge volumes over the full LOM.

Agnico Eagle's Response to Request:

Response to bullet a)

The Operational Update mine life is 14 years. As stated in the amendment (Section 3.1 of the Main Application Document), phases are as follows:

- Construction: 2027, upon reception of approvals
- Operations: 2030-2043 (referenced as Y0 to Y13 in supporting studies)
- Closure: 2044-2047

Response to bullet b)

The 2017 FEIS included generalized assumptions regarding mining schedules and production rates that were expected to evolve through detailed design, operations, and ongoing exploration. It is recognized as part of the environmental assessment stage that throughput, mine life, and total tonnes mined are planning parameters that may evolve as resource knowledge, mine sequencing, and engineering design are refined over time. The optimized mine plan associated with the Operational Update is expected to have approximately 14 years of operational mine life which is the same as the 2017 FEIS and also includes future development and extended life of mine which is common mining operations. Agnico Eagle intends to continue exploration activities with the goal of further extending the mine life.

Response to bullet c)

See CIRNAC-TRC-11a).

Response to bullet d)

The Water Balance and Water Quality Model (Appendix 4-F) was developed using the optimized Operational Update mine plan. These volumes will be managed within the existing water management framework and adaptive management requirements of the Water Licence.

The current Water Licence authorizes a total annual freshwater consumption of 2,033,800 m^3/year. As part of the amendment, Agnico Eagle is requesting approval to increase total annual freshwater consumption to 2,916,855 m^3/year from Doris Lake, Windy Lake, and Patch Lake for mining, milling, industrial, and domestic use. Potential effects associated with increased water withdrawals are documented in the Conceptual Fish Offsetting Plan (Table 3.1, Appendix 6-Q); Agnico Eagle will optimize freshwater withdrawals at Doris Lake, Windy Lake, and/or Patch Lake to minimize effects to fish habitat; see response to DFO-TRC-01.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-TRC-13
Re:	Multiple-Accounts Analysis (MAA) – Tailings Management Strategy Selection		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) Provide the results of the Multiple-Accounts Analysis supporting selection of the filtered tailings option, including criteria, weightings, scoring, and sensitivity analysis; or

b) If there is financially sensitive information in the MAA, provide a redacted version or a detailed technical summary that is sufficient to demonstrate that the selected tailings management option is preferred with respect to water-related environmental outcomes.

Agnico Eagle's Response to Request:

The phased transition from slurry to filtered tailings was evaluated through a structured multiple accounts analysis (in accordance with ECCC (2016) guidance) and was determined to be the preferred alternative option for the base case slurry deposition. The preferred alternative was based on:

- Reducing the overall site water inventory through implementation of filtered tailings;
- Decreasing process water discharge requirements during operations;
- Minimizing the need for major dam raises and associated containment risks;
- Reducing seepage potential through lower stored water volumes; and
- Supporting progressive reclamation throughout operations.

However, flexibility in management of tailings at the Hope Bay mine through typical adaptive management is necessary for optimal utilization of the TIA.

The transition from slurry deposition to filtered tailings does not represent a new type of work or activity, nor does it constitute a material change to the previously assessed project. Dry-stack tailings was evaluated during the 2017 FEIS and subsequent NIRB environmental assessment process and the Tail Lake basin was identified as the preferred location for tailings management. Project Certificate No. 003, Term and Condition 6, specifically contemplated that tailings management may be modified in future:

> *"Tail Lake has been selected as the Tailings Impoundment Area for the Doris North Project. The NIRB would expect that the Proponent, as soon as reasonable, would notify it of modifications to the Tailings Impoundment Area. Further, due to the phased nature of project development along the Hope Bay Belt, the applicability of this condition may be considered in relation to subsequent development applications."*

Accordingly, the Operational Update represents an optimization of an already assessed and approved tailings management activity rather than the introduction of a new facility, new location, or new environmental effects pathway.

However, to satisfy the reviewer's request, the following technical summary has been prepared. The MAA considered a range of tailings management alternatives within the existing TIA catchment and identified a phased transition from slurry to filtered (dry-stack) tailings as the preferred option. Consideration of tailings management alternatives for the Hope Bay Mine is not new (e.g., TMAC 2017). The conceptual design (Appendix 3-A) also confirms the technical feasibility of implementing the approach within the same TIA catchment area. To the extent relevant to the amendment application, the considerations of the MAA have already been reflected in the supporting materials submitted to the NWB.

Alternatives Considered

The following tailings management alternatives were considered in the MAA:

Tailings Management Approach	Tailings Dewatering Technology	Selected for Alternatives Assessment	Comments
Engineered containment dams	Conventional thickened slurry	Yes	This is the currently permitted tailings management approach at Hope Bay. For the PLOM plan, construction of larger dams would be required.
	High-density thickened or paste	No	High-density thickened or paste technology was not considered for this assessment, as it was determined to be similar to conventional slurry tailings and not a distinct alternative.
In-pit (with or without containment dams)	All	No	The Hope Bay PLOM plan currently only includes underground mining, with the exception of the Naartok East Crown Pillar Recovery Trench (CPRT), which contains (connected to) the portal and does not provide a large enough capacity to be considered further.
Filtered Tailings Stack	Filtered	Yes	Filtered tailings stack alternatives is considered and it is also a technology used in other Agnico Eagle mine sites, and has been permitted at Hope Bay (Boston).
Underground Mine Backfill	Any (though typically cemented or uncemented paste)	Yes	Agnico Eagle has advised that underground paste tailings should be considered as an alternative to cemented rock fill.
Marine Discharge	None	No	Not considered as it is not possible within the current TIA

A reduction in discharge volume coincides directly with implementation of the preferred alternative option ,dry stack filtered tailings, and reflects a significant reduction in water reporting to the TIA. The water-related benefits identified through the MAA were subsequently evaluated in the site-wide Water and Load Balance Model (Appendix 4-F). Some of the technical considerations included in the evaluation of deposition options included:

- Volumes of water stored within the TIA (generally more with slurry tailings);
- Hydraulic heads against containment structures;
- Extent of ponded water;
- Hydraulic gradients driving seepage;
- Water trapped in the tailings;
- Ease of recover/reclaim of water for reuse in the process plant prior to deposition;
- Progressive reclamation options and isolation of tailings surfaces.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-14**
Re:	**Dry Stack Tailings Closure Strategy**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Provide a conceptual dry stack closure design, including cover system, infiltration control, and water management approach;*
b) *Confirm that the source term predictions (Appendix 4E) and water quality and load balance mode predictions (Appendix 4F) are based on the placement of a complex, low-permeability geomembrane cover over the dry-stack and slurry tailings;*
c) *Provide the incremental closure costs associated with construction of a complex, low-permeability geomembrane cover relative to the previously proposed cover strategy;*
d) *Model post-closure seepage quality and quantity under baseline and climate change scenarios; and*
e) *Demonstrate that closure water quality objectives can be achieved without reliance on long-term active treatment.*

Agnico Eagle's Response to Request:

Response to bullet a)

As noted in response to KitIA-NWB-11, the closure concept for the Doris TIA remains at a conceptual level and will be advanced as mining progresses and through updates to the ICRP. This is a typical approach for the current operational stage of the facility.

The current closure approach for the existing slurry tailings area is a physical isolation cover consisting of approximately 0.3 m of run-of-quarry rock placed over the tailings surface to limit erosion and tailings mobilization.

Response to bullet b)

The source terms for the TIA used in the Water and Load Balance model are based on low permeability geomembrane cover over the dry-stack area. As noted in bullet a), this is a conceptual mitigation that is one option amongst other possible mitigations. The geomembrane mitigation was selected by the modelers, however they also note that it does not disqualify other potential mitigations and that further analysis is required to determine the appropriate mitigation, if required.

Response to bullet c)

Agnico Eagle did provide an updated security estimate to CIRNAC on June 18, 2026. This included a tranche approach based on the cover transition and final planned disturbance area. As the security is under review with KitIA/CIRNAC, we will not provide costs here. Discussions on security will occur through a separate avenue (see CIRNAC-TRC-23); however, a summary of the tranche breakdown is summarized below.

- Tranche 1 includes a 0.3 m erosion cover on current 176 ha TIA footprint as per the current slurry tailings design (as stated in response to KitIA-NWB-11). This tranche also includes TIA shoreline protection, 0.5m, and associated geomembrane for the final shoreline area of 45 ha.
- Tranche 2 includes 0.3 m erosion cover on final 191.1 ha TIA footprint as per the current slurry tailings design.
- Tranche 3 includes the final 191.1 ha footprint lined with geomembrane should an isolation cover be required.

Response to bullet d, e)

Based on the geochemistry dataset, knowledge of the site, and knowledge of other mining operations in Nunavut, Agnico Eagle expects to meet post-closure water quality without the reliance on long-term treatment. As typical for mining sites and Type A Water Licence, operational monitoring data will be collected which will inform updates to closure concepts and development of final closure and reclamation engineering details. This information will be provided through regular updates to the water and load balance, and the ICRP.

Agnico Eagle takes environmental commitments seriously: “Sustainability is a fundamental consideration during all phases of operations, from exploration to reclamation.” (available at: Agnico Eagle Mines Limited - Sustainability - Our Approach)

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-15**
Re:	**Fugitive Dust and Air Quality – Dry Stack Tailings (Operational Phase)**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Provide a quantitative assessment of fugitive dust generation from the dry stack tailings during operations;*
b) *Characterize the expected composition of dust, including key parameters such as arsenic;*
c) *Describe dust mitigation and monitoring measures; and*
d) *Confirm that dust deposition will not result in measurable adverse effects on environmental quality, including surface water.*

Agnico Eagle's Response to Request:

Response to bullet a)

It should be noted that dust monitoring is captured under Project Certificate No.009. Term and Condition No. 1. Agnico Eagle does not agree that a detailed quantitative dust dispersion assessment or a fully developed dry stack-specific dust monitoring program is required at this stage. The dry stack facility remains at a conceptual level of design, and the transition to filtered tailings placement is not expected until later in mine life.

Response to bullet b)

As indicated in CIRNAC's request, Agnico Eagle has provided the composition of tailings in the Interim Source Term Report (Appendix 4-E).

Response to bullet c)

As written in Section 5.5 of the Doris TIA OMS Manual (Appendix 6-N) several dust control measures will continue to be implemented to mitigate and prevent, as practicably as possible, fugitive dust generation. For example, Agnico Eagle expects to use up to 25,000 m^3/yr water for dust suppression (provided in response to IR (CIRNAC-IR-01); April 9, 2026). If necessary, an environmentally suitable chemical dust suppressant can also be applied to areas of particular concern. Application of water and/or dust suppressant is reviewed on an ongoing basis to ensure areas of dusting are adequately covered.

For further details please refer to the Tailings Area Dust Control Strategy for Doris TIA in Appendix B of Appendix 6-N. In addition, as per Project Certificate No.009, Term and Condition No. 1, an Air Quality Management Plan exists which includes dust monitoring. This plan is robust enough to continue monitoring dust from the Tailings Impoundment Area. Further information is provided in ECCC-TRC-01.

Response to bullet d)

As previously assessed and approved in the 2017 FEIS for the Boston area, dry stack tailings will not result in measurable adverse effects on the environment (Nunami Stantec, 2017). Agnico Eagle will implement dust suppression mitigation measures to minimize the generation of dust and transport of dry-stack tailings.

Citation:

Nunami Stantec. 2017. The Madrid-Boston Project: Air Quality Modeling Study. Prepared for TMAC Resources Inc. by Nunami Stantec Ltd.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-16**
Re:	**Updated Tailings Facility Design and Operation**		

Request Made by Interested Party:
CIRNAC recommends that the Board ensure that the Proponent provide clarity on what is meant by its references to "within the existing TIA footprint" and provide additional discussion and details to support the statement that all tailings generated under the amended operations will in fact fall within the existing TIA footprint.

Agnico Eagle's Response to Request:
The updated tailings facility will remain within the general area of Tail Lake, with modifications to ensure tailings capacity, but will not expand to include any additional waterbodies. For clarity, the amended design remains within the Tail Lake TIA catchment and avoids development of a new tailings disposal location or a new receiving environment.

As described in the Main Application Document (Section 3.3.4) and Appendix 3-A (TIA Filtered Tailings Conceptual Design Assessment), deposition would occur within the area bounded by the existing North Dam, South Dam, and surrounding overburden, with the ultimate facility area (including any dams such as described in "Operations, Maintenance and Surveillance Manual: Doris Tailings Impoundment Area", Appendix 6-N) determined by the assumed design value for tailings density, which may vary in accordance with the deposition technology (Section 2.3, SRK, 2017).

Citation:
SRK. 2017. Package P5-16, Doris Tailings Management System Phase 2 Design. November 2017

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-17**
Re:	**Justification of Maximum Water Withdrawal Rates (Dry Stack Transition)**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Provide a comparison of water withdrawal requirements for slurry versus dry stack tailings at equivalent throughput;*
b) *Quantify expected reductions in make-up water demand resulting from filtration;*
c) *Demonstrate how these reductions have been incorporated into the requested maximum withdrawal limits;*
d) *Identify the conditions under which maximum withdrawal rates would be required (e.g., low-flow conditions, reduced recycle efficiency); and*
e) *Confirm that requested limits do not exceed those necessary to support the amended mine plan.*

Agnico Eagle's Response to Request:

As an overall response, Agnico Eagle confirms that all water withdrawals at the Hope Bay Project will occur in compliance with the overall water use requested in the amendment application. As demonstrated by the application, this overall water use request is supported by evidence that Agnico Eagle can operate within this amount without significant impacts to water resources in the area.

Agnico Eagle has confirmed the presented options can proceed in an environmentally protective manner; as such our view is that rather than focusing on the narrow issues such as what option might use more or less water, the more important consideration in the context of this file is the principle that the designated TIA area can be safely maximized through the requested amendments in order to support the overall goal of optimizing the existing facilities and project footprint.

Response to bullet a, b)

We will be requesting the prescribed volumes for our flexibility to ensure we derisk the project. Agnico Eagle will reclaim water as much as possible during slurry deposition and if the preferred alternative is commissioned.

Response to bullet c)

Agnico Eagle has presented maximum withdrawal rates of freshwater inclusive of a 20% contingency. This conservatism was carried forward in the analysis of water withdrawals, potential effects to fish and fish habitat, and the conceptual fish offsetting plan (Appendix 6-Q). This analysis provides an outlook on maximum possible effects to lake water level drawdown, and potential reduction in outlet flows. Any reduction in freshwater withdraw in a given year would result in lower changes than presented in the application. This provides flexibility to the operation and derisks the operation.

Response to bullet d)

Maximum withdrawal rates for each withdrawal source waterbody are presented in Table 3.3-1 of the Main Application Document, and in response to CIRNAC-IR-01; this is based off the global water requirement for the mine on an annual basis for each year of operation. However, conservatism was incorporated in assessing the annual water requirements to minimize operational disruptions. In the event of low-flow conditions, or high recycle and reclaim efficiency, the total withdrawn in a year may be less.

Response to bullet e)

Agnico Eagle confirms the volumes requested are required to consistently operate the mine, and that the evidence supports our view that this is an environmentally protective approach. The requested freshwater taking limits are based on the maximum possible water taking requirements for the mining operations, with a 20% contingency. These limits represent the maximum possible requirement for freshwater at Hope Bay Mine. Agnico Eagle is a global leader in water conservation and stewardship and will continue to find methods to reduce freshwater intake during the operational phase of the project.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-TRC-18
Re:	Water Balance Stress Test (Non-Average Conditions)		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Provide water balance stress test scenarios representing low-flow and extreme inflow conditions;*
b) *Demonstrate that the water management system can operate without uncontrolled discharge under these scenarios; and*
c) *Confirm that storage, pumping, and treatment capacity are sufficient to maintain compliance under extreme conditions.*

Agnico Eagle's Response to Request:

Response to bullet a)

Agnico Eagle incorporated SSP2-4.5 climate scenario to assess varying climate conditions. Note that climate models have built in variability for all parameters, including precipitation. The water and load balance model as presented in Appendix 4-F includes periods of dry, average and wet conditions as per the climate model.

Response to bullet b)

The water and load balance model predicts that discharge volumes will be within operational limits of the Hope Bay Mine. For example, pumping infrastructure is generally sized to about 400 m^3/hr, or 3.5 Mm^3 per year flow. Maximum predicted discharge from the water and load balance model was 2.37 Mm^3 for the TIA and 1.03 Mm^3 for the underground water. These flows are within the range of existing water management infrastructure. In addition to long-term water balance assessments such as Appendix 4-F, Agnico Eagle also incorporates flooding events in the design criteria of water management systems. For example, rain-on-snow extreme flooding event inflows are included in the detailed design of ponds, ensuring that the pond can hold the flood inflow and pumps are appropriately sized to dewater the pond at the same time. This ensures that ponds are appropriately sized to prevent overtopping. Detailed design reports for ponds, including flooding events, are available for review under the 60-day notice process.

Response to bullet c)

Agnico Eagle confirms that all water management infrastructure have been evaluated, sized and designed to meet Agnico Eagle corporate standards for critical infrastructure and water management (Agnico Eagle 2025). Thus the facilities will manage water and maintain compliance under extreme conditions (see response to KitIA-IR-36 [April 9, 2026 response to Information Requests package]) for volumes of all water management facilities.

Citation:

Agnico Eagle (Agnico Eagle Mines Limited). 2025. Water Management Policy. January 2025. Available at: EN-Water-Management-Policy-2025-FINAL.pdf

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-19**
Re:	**No Freshwater Discharge Commitment**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Confirm whether any discharge to freshwater will occur under any operating condition;*
b) *If no discharge is proposed, provide an explicit commitment to this effect; and*
c) *Describe contingency measures that ensure freshwater systems are protected under upset and extreme conditions.*

Agnico Eagle's Response to Request:

Response to bullet a) and b)

The proposed water management strategy prioritizes the collection, containment, treatment, and discharge of contact water to the marine environment via the Roberts Bay marine discharge system. No changes are proposed to the existing Water Licence provisions that allow certain controlled discharges to tundra under specified conditions (e.g., sewage treatment plant effluent and designated sump discharges that meet applicable discharge criteria). These discharges may ultimately report to freshwater receiving environments and remain subject to Water Licence effluent limits (e.g., Part F, Items 5, 18), monitoring, inspection, and reporting requirements. During normal operations, contact water will be managed within the site water management system and directed to treatment and/or marine discharge, or to the tundra. In addition, no changes to the TIA strategy of low-probability emergency overflow channel to Doris Lake (Operations, Maintenance and Surveillance Manual: Doris Tailings Impoundment Area, Appendix 6-N).

Response to bullet c)

In upset or extreme events, contingency storage capacity, operational controls, and implementation of the Water Management Plan, Spill Contingency Plan, Emergency Response Plans, and adaptive management measures will be used to prevent and mitigate potential releases. Any unauthorized discharge would be managed and reported in accordance with Water Licence requirements. Accordingly, the proposed amendment maintains a water management approach that prioritizes marine discharge while ensuring that any authorized tundra discharges remain controlled, monitored, and protective of the receiving environment.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-20**
Re:	**Source Term Conservatism and Sensitivity**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Identify conservative assumptions used in the source term development;*
b) *Provide sensitivity analysis for key parameters (e.g., arsenic, sulphate, nitrogen); and*
c) *Demonstrate that predicted effluent quality remains within acceptable limits under a range of plausible conditions.*

Agnico Eagle's Response to Request:

Response to bullet a)

Extensive geochemical testing has been completed for the Hope Bay Complex, as described in Section 4.1 of the Main Application Document and Appendices 4-A and 4-B. This testing provides an initial understanding of constituents of concern for the area; monitoring during mining activities will continue to be used to validate predictions and assumptions and, where necessary, confirm mitigation measures.

To incorporate uncertainty in the source term predictions, two cases were considered in the Interim Geochemical Source Term report, Appendix 4-E of the Operational Update Application. The first case uses typical inputs to the source term calculation and is intended to represent the expected outcome of the planned waste and water management approach. This is referred to as the "Base Case". A second case, the "Upper Case", which is the conservative approach, considers upper limit uncertainty in the inputs that are intended to provide an upper bound of the calculated source terms. Base Case and Upper Case scenarios for input weathering rates and solubility controls have been determined using median (Base Case) and 95th percentile (Upper Case) statistics. Table 7-19 of Appendix 4-E presents the summary of upper-case source term results.

Response to bullet b)

A sensitivity analysis was provided and included in the application (Appendix 4-E, Tables 7-18 and 7-19). The sensitivity analysis was performed using the input weathering rates and solubility controls using the 95th percentile statistics instead of the median. Table 7-18 and 7-19 of the Geochemical Interim Source Term report, Appendix 4-E, shows the Upper and Base case source terms for arsenic and sulphate. Nitrogen is expressed in the form of nitrate, nitrite and ammonia. Nitrogen loadings are calculated in the Water Load Balance model (Appendix 4-F of the Operational Update application) based on loss factors and speciation that have been calibrated with site data.

Response to bullet c)

As reported in the main document of the Operational Update application, water quality is predicted to be slightly better compared to the 2017 FEIS model due to segregation of saline and process water. It is to be noted that a similar approach was used for both the 2017 and 2026 Water Load Balance models and Source Term calculations, supporting confidence in predictions derived from historical data.

Final effluent predictions were developed (see Tables 5-2 and 5-3 of Appendix 4-F). Any constituents above the discharge criteria (e.g., arsenic, total cyanide and total suspended solids) can be treated by the existing (contact water) effluent water treatment plant (EWTP) and the saline water effluent treatment plant (SETP). Finally, the predicted discharge quantity and quality was used in the Roberts Bay modelling study to derive dilution ratios (Appendix 4-G). While the marine environment is outside the scope of this application, the Roberts Bay modelling predicts that effluent will disperse effectively and mix adequately within the defined mixing zone. Project-related increases in water quality concentrations are predicted to be minimal, ranging from less than 1% to less than 10% above background at the mixing zone boundary.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-21**
Re:	**Under-Ice/Seasonal Operations Constraint**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) *Define operational constraints under winter and under-ice conditions;*
b) *Describe how water withdrawals, storage, and discharge will be managed during these periods; and*
c) *Demonstrate that the water management system will operate without adverse impacts under seasonal conditions.*

Agnico Eagle's Response to Request:

Agnico Eagle is a senior mining company with more than 15 years of operating experience in Nunavut. The NWB can be confident that Agnico Eagle has the Arctic operating experience and technical expertise needed to design, operate, and maintain water management infrastructure under both ice-covered and open-water conditions. In addition, Hope Bay is not a new site. It is a previously assessed, previously approved, and actively regulated mine with existing infrastructure, approved management plans, and ongoing monitoring, inspection, and reporting requirements.

Response to bullet a)

Operational constraints under winter conditions are primarily around access to water for pumping purposes. Agnico Eagle's Arctic and overall operating experience means water management infrastructure is designed specifically with these challenges in mind. For example, pump intake is designed around the reality of freeze-up of surface waters and maximum ice thickness.

Response to bullet b)

As presented in the water and load balance report (Appendix 4-F), Hope Bay Mine will discharge through the year via diffusers in Roberts Bay. Also noted in response to bullet a), all pumping infrastructure are designed with winter conditions in mind. Agnico Eagle has extensive experience operating under harsh winter conditions in Nunavut at Meliadine and Meadowbank mines. This operational experience extends to the operation of Hope Bay Mine as well.

Response to bullet c)

Agnico Eagle incorporates all possible seasonal effects into the engineering and design of its water management infrastructure. This not only includes special considerations under winter conditions but also includes other seasonal effects as well, such as rain-on-snow flooding during freshet (see CIRNAC-TRC-18b). This level of conservatism in the engineering of water management infrastructure combined with Agnico Eagle's extensive experience operating in Nunavut indicate that the Hope Bay Mine will operate without adverse impacts under seasonal conditions.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-22**
Re:	**Uncertainty Register And Commitments**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent:

a) Provide an uncertainty register identifying key uncertainties across all components of the project;
b) Identify associated risks and potential environmental implications;
c) Define mitigation measures, monitoring requirements, and actions to address each uncertainty;
d) Provide timelines for resolution; and
e) Link these commitments to future plan submissions and licence conditions where appropriate.

Agnico Eagle's Response to Request:

Agnico Eagle does not accept this recommendation. The rationale for this is provided below through addressing specific aspects that were noted as areas of uncertainty. None of the items listed by CIRNAC are considered "*unpredictable*", nor if the perceived uncertainty is realized, would they "*significantly impact project scope, cost or timing*". Further to this, the project has been assessed and we have an approved FEIS. Agnico Eagle will not respond to the recommendations as these are not relevant for this application.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-TRC-23**
Re:	**Interim Closure and Reclamation Plan (ICRP) And Security**		

Request Made by Interested Party:

CIRNAC recommends that the Board ensure that the Proponent provide a detailed technical ICRP update that includes the following technical information:

a) details on all relevant closure elements, activities, quantities and schedules;
b) details that support the selected closure approach for each closure element; and
c) details on performance objectives and criteria to support acceptance of the closure works.
d) a conceptual closure security estimate that identifies and includes costs for closure of all aspects of the proposed Operational Update including the proposed dry stack tailings facilities.

Agnico Eagle's Response to Request:

Agnico Eagle has provided the ICRP (which by definition is interim, and thus includes preliminary concepts for closure) and an updated security estimate was provided on June 18, 2026 to CIRNAC and the KitIA. For reference, Agnico Eagle and KitIA are aligned in costs, including the tranches and the split to KitIA and CIRNAC.

Response to bullet a), b), and c)

Agnico Eagle agrees with CIRNAC's statement in their comment summary that "*High level discussions of potential closure actions for existing, changed, and new facilities are provided*." in that, the ICRP was updated based on applicability of the Water Licence Amendment scope activities, includes closure objectives to the level needed within an ICRP, and includes closure approaches. Agnico Eagle recognizes that Section 7 (Cost Estimate) would be updated following the Water Licence Amendment process, as per previous commitment.

Based on discussions related to the dry stack tailings closure, Agnico Eagle has provided a response within CIRNAC-TRC-14. While the tailings impoundment area was documented in the ICRP, further clarifications have been provided (CIRNAC-TRC-14) to support CIRNAC's requests and where applicable, can be updated in the ICRP.

As previously stated, the ICRP will be updated 60 days from Minister approval of the Water Licence Amendment.

Response to bullet d)

Agnico Eagle appreciates the ongoing collaboration to date with CIRNAC to work towards agreement on the global security number. We are confident that with the steps and meetings thus far, agreement on the global security number for the final hearing will be achieved.

ENVIRONMENT AND CLIMATE CHANGE CANANDA (ECCC)

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-01**
Re:	**Dust-Related Impacts to Water Quality**		

Request Made by Interested Party:

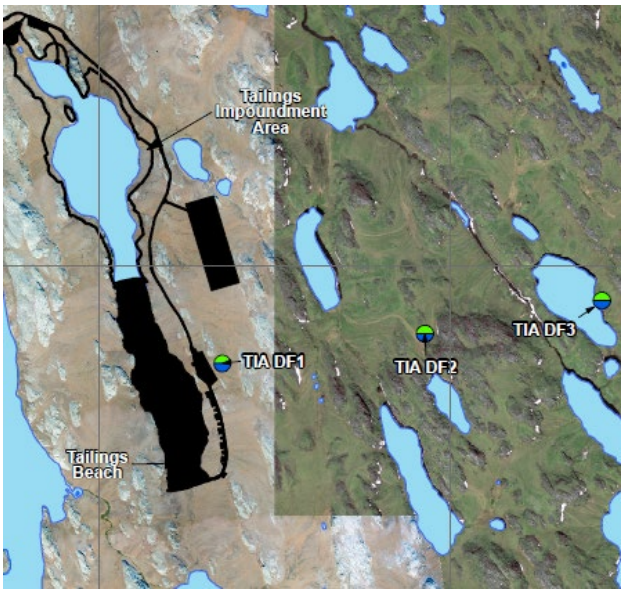
ECCC recommends the Proponent:

1. *Discuss the direction dust from the dry stack would be expected to disperse, including predictions for dispersion distance from the facility;*
2. *Discuss planned measures to mitigate and monitor for dust and snowpack deposition related impacts on water bodies from the dry stack tailings. This should be outlined in an existing monitoring and management plan or a new plan prior to transition to dry stack; and*
3. *Discuss planned monitoring in advance of implementation of the dry stack configuration to characterize existing dust/snow conditions in the absence of the dry stack tailings facility.*

Agnico Eagle's Response to Request:

Response to bullet 1)

It should be noted that dust monitoring is captured under Project Certificate No. 009. Term and Condition No. 1. To address this comment, Agnico Eagle have three established dust monitoring stations as presented in the image below (Air Quality Management Plan, Figure A.2) to the east of the Tailings Impoundment Area. As outlined in the Atmospheric Compliance Monitoring Program Report (submitted with NIRB Annual Report; ID: 361093), prevailing winds at Hope Bay are predominately from the west.



Response to bullet 2, 3)

See response to CIRNAC-TRC-15.

Interested Party:	ECCC	Rec No.:	ECCC-TRC-02
Re:	Aquatic Effects Monitoring Program (AEMP) Monitoring Stations		

Request Made by Interested Party:

ECCC recommends the Proponent provide additional analysis and discussion on the following:

1. *Whether the reasons for monitoring and monitoring triggers in Table 3.1-1 will change with the Operational Update and update the table accordingly;*
2. *Discuss whether expanded more comprehensive monitoring is required in Windy and Imniagut Lakes; and*
3. *Provide rationale for whether existing monitoring stations in Windy Lake and Patch Lake are in suitable locations to detect indirect changes due to proximity to mine infrastructure.*

Agnico Eagle's Response to Request:

Response to bullet 1)

Agnico Eagle has made the following updates to Table 3.1-1 (**bolded text**) due to the addition of hydrological monitoring stations in Roberts Lake and Patch Lake:

Table 3.1-1. Study Area Descriptions and Monitoring Triggers

Watershed	Study Area	Description	Monitoring Trigger	Reason
Windy Watershed	Windy Lake	Windy hydrological monitoring station	Doris and Madrid Construction and Operations	Direct potable water withdrawal (increased accommodation at Doris)
	Glenn Lake	Accessible location near exposed bedrock	Doris and Madrid Construction and Operations	Indirect potable water withdrawal; downstream of Windy Lake
Doris Watershed	Wolverine Lake	Deep basin representative of lake and accessible location near exposed bedrock	Madrid South Construction and Operations	Groundwater inflows; Indirect inputs due to proximity
	Patch Lake	Deep area in center of lake representative of lake and accessible location near exposed bedrock; **hydrological monitoring station**	Madrid Construction and Operations	**Direct water withdrawal**; Groundwater inflows; Indirect inputs due to proximity
	Imniagut	Accessible location near exposed bedrock	Madrid Operations	Groundwater inflows
	P.O. Lake	Accessible location near exposed bedrock	Madrid Operations	Groundwater inflows
	Ogama Lake	Accessible location near exposed bedrock	Madrid Operations	Groundwater inflows
	Doris Lake	Deep basin representative of lake and Doris hydrological monitoring station	Doris and Madrid Construction and Operations	Direct water withdrawal; groundwater mine inflows; Indirect inputs due to proximity
			Boston Operations	Direct water withdrawal

Watershed	Study Area	Description	Monitoring Trigger	Reason
	Little Roberts Lake	Accessible location near exposed bedrock	Doris and Madrid Construction and Operations	Indirect water withdrawal and mine inflows; downstream of Doris Lake
			Boston Operations	Indirect water withdrawal; downstream of Doris Lake
	Roberts Lake	**Deep basin representative of lake, reference area for AEMP hydrological monitoring station**	**Doris and Madrid Construction and Operations**	**Additional hydrological Reference area for AEMP**
Aimaokatalok Watershed	Stickleback Lake	Deep basin representative of lake	Boston Construction and Operations	Indirect inputs due to proximity
	Aimaokatalok Lake – Deep (Aim-Deep)	Deep basin representative of lake	Boston Construction and Operations	Indirect inputs due to proximity
	Aimaokatalok Lake – West (Aim-West)	Basin in western Aimaokatalok Lake	Boston Construction and Operations	Permitted discharge
	Aimaokatalok Lake – EEM (Aim-EEM)	MDMER EEM sampling area	Discharge to Aimaokatalok Lake - MDMER	Permitted discharge
Reference	Reference Lake B	Deep basin representative of lake, reference area for AEMP and MDMER EEM programs	Doris, Madrid, and Boston Construction and Operations	Reference area for AEMP and MDMER EEM

Response to bullet 2)

Additional hydrological monitoring will be conducted on the lakes where water withdrawals have been proposed (Patch, Windy, Doris) details are provided in DFO-TRC-01 and DFO-TRC-03. Agnico Eagle will follow the sampling plan as prescribed within the AEMP for Imniagut Lake, no additional monitoring is being considered at this time as the current plan is sufficiently robust for monitoring lake drawdown effects.

Response to bullet 3)

Several years of baseline data (1995-1998; 2006-2010) and continuous monitoring stations (2017-2025) have been established in the northeastern basins of Patch Lake and Windy Lake. These stations are located near mine infrastructure and are appropriately positioned to monitor potential water withdrawal effects and water quality effects (e.g., non-point source inputs from runoff and dust) within the AEMP.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-03**
Re:	**AEMP Benchmarks – Federal Environmental Quality Guidelines and Canadian Council of Ministers for the Environment Guidelines Updates**		

Request Made by Interested Party:

ECCC recommends that the Proponent provide a review of the updated and new guidelines (FEQG and CCME) for inclusion in the AEMP and confirm whether they will be adopted as new or updated water quality benchmarks. Where the updated guidelines are not adopted, technical supporting rationale should be provided.

Agnico Eagle's Response to Request:

Agnico Eagle will review and evaluate any new FEQG and CCME guidelines for inclusion within the next AEMP and determine whether updated water quality benchmarks are warranted accordingly. Agnico Eagle confirms that where the updated guidelines are not adopted, technical supporting rationale will be provided.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-04**
Re:	**Sewage Discharge – Tundra vs. Tailings Impoundment Area (TIA)**		

Request Made by Interested Party:

ECCC recommends the Proponent provide:

1. *A discussion of the necessity to discharge sewage to the tundra or whether all sewage effluent could be combined with other wastewater streams and directed to the TIA;*
2. *Discuss whether other similar projects utilize sewage effluent discharge to the tundra;*
3. *Predicted volumes of sewage effluent discharged to the tundra under maximum camp capacity compared to recent discharge volumes and current maximum camp size volumes (400 people); and*
4. *An evaluation of whether existing monitoring in Doris Lake is appropriate to monitor for effects from the sewage effluent discharge, given the increased volumes of the sewage effluent.*

Agnico Eagle's Response to Request:

Response to bullet 1)

The Sewage Treatment Plant (STP) discharge may be combined with other waste water and directed to the TIA; however, this is not the preferred option for Agnico Eagle. By mixing streams, the combined chemistries of the wastewater streams become more complex and unnecessarily complicating treatment. For example, septic waste is chemically characterized to contain low metals, high nutrients, Biological Oxygen Demand (BOD) and bacteria content. Conversely, process plant effluent is characterized as containing high metals concentration, low BOD and low nutrients. Typical septic treatment can be inhibited by excessively high metals concentrations, such as copper, thus combining streams creates unnecessary complications for water treatment. By keeping the streams separate, each treatment system can be specifically designed and operated for the unique chemical signatures of their respective influent.

The STP is designed based on the water quality criteria listed in Part F, Item 5b. of the Water Licence. As assessed initially for the 2013 water licence amendment application, the discharge criteria are considered to continue to be appropriate for direct discharge to the tundra and no changes have been proposed to the existing Water Licence criteria.

Response to bullet 2)

As mentioned above, the discharge of STP effluent to the tundra has previously been evaluated in the 2013 water licence amendment. There are various examples of direct discharge to the tundra; however, one similar example to the STP at the Doris Camp is the sewage treatment system at the Back River Project that services a 600 person camp.

Response to bullet 3)

Agnico Eagle is applying for an increase in domestic use water taking which increases water consumption from 43,800 m^3/year (Part F, Section 1 of 2AM-DOH1335) to 90,000 m^3/year [KitIA-NWB-02 bullet 1]). STP is designed for up to 209 m^3/day maximum flow, averaging 130 m^3/day for the entire year. This amounts

to half of the requested freshwater taking volume for domestic use. Discharge of sewage to the tundra will still be bound by water quality criteria listed in Part F, Item 5b. of the Water Licence. As evaluated initially for the 2013 water licence amendment application, the discharge criteria are considered appropriate for direct discharge to the tundra.

Response to bullet 4)

The sewage effluent discharges to the west of the main site (towards Glenn Lake but through a large wetland area and not direct into Glenn Lake). Doris Lake is east of the main site.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-05**
Re:	**Updates to Water Licence and Water Management Locations and Monitoring**		

Request Made by Interested Party:

ECCC recommends that:

1. *Changes in the marked-up update to the Licence (including but not limited to Tables 2 and 3) are accompanied by clear rationale describing the basis for the changes; and*
2. *The Proponent provide a figure that depicts any new proposed monitoring stations in relation to relevant infrastructure (e.g. waste rock piles, ore storage, etc.) to facilitate understanding of water management and monitoring.*

Agnico Eagle's Response to Request:

Response to bullet 1)

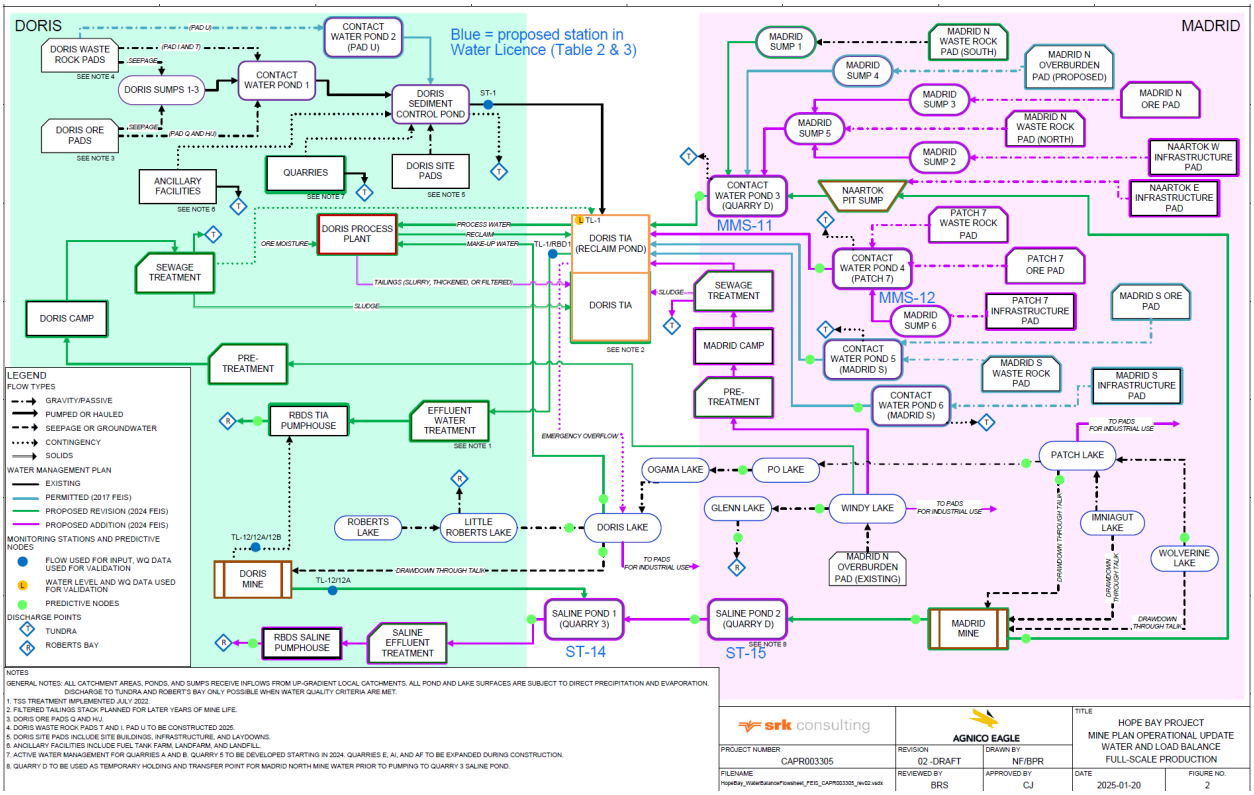
Agnico Eagle agrees with this recommendation and will provide this information with the mark-up Water Licence.

Response to bullet 2)

Agnico Eagle is proposing 4 new stations, ST-14 (Saline Pond 1), ST-15 (Saline Pond 2), MMS-11 (CWP3), and MMS-12 (CWP4). These stations are located at key collection points where multiple inflows discharge to a common water storage infrastructure. If a parameter is observed to be trending different than expected (e.g., increasing or decreasing), targeted follow-up investigations (e.g., ad-hoc sampling of individual sumps or inflows contributing to the station, or other investigation) could be undertaken to determine the source. In the marked-up Water Licence, Agnico Eagle will also be proposing name changes to existing stations to align with our updated naming convention, this includes the following:

Station	Current Name in Water Licence	Name Change for Water Licence Amendment
ST-1	Doris Sedimentation Pond	Doris Contact Water Pond 1A
ST-2	Doris Contact Water Pond	Doris Contact Water Pond 1B
ST-13	Doris Contact Water Pond (associated with Pad U)	Doris Contact Water Pond 1C
MMS-1	Madrid North Contact Water Pond	Madrid Sump 1
MMS-2	Madrid South Primary Contact Water Pond	Madrid Contact Water Pond 5
MMS-3	Madrid South Secondary Contact Water Pond	Madrid Contact Water Pond 6
MMS-5	Discharge from Madrid South Fuel Storage Facility	Discharge from Patch 7 Fuel Storage Facility

An initial figure is provided below; however, a sample station figure is being prepared and will be provided with the 2026 annual report.


DORIS
MADRID
Blue = proposed station in Water Licence (Table 2 & 3)
CONTACT WATER POND 2 (PAD U)
DORIS WASTE ROCK PADS
DORIS SUMPS 1-3
CONTACT WATER POND 1
DORIS SEDIMENT CONTROL POND
DORIS ORE PADS
ANCILLARY FACILITIES
QUARRIES
DORIS SITE PADS
DORIS PROCESS PLANT
SEWAGE TREATMENT
DORIS CAMP
PRE-TREATMENT
DORIS TIA (RECLAIM POND)
DORIS TIA
RBDS TIA PUMPHOUSE
EFFLUENT WATER TREATMENT
ROBERTS LAKE
LITTLE ROBERTS LAKE
DORIS LAKE
DORIS MINE
RBDS SALINE PUMPHOUSE
SALINE EFFLUENT TREATMENT
SALINE POND 1 (QUARRY 3)
ST-14
SALINE POND 2 (QUARRY D)
ST-15
MADRID SUMP 1
MADRID SUMP 4
MADRID SUMP 3
MADRID SUMP 5
MADRID SUMP 2
MADRID N WASTE ROCK PAD (SOUTH)
MADRID N OVERBURDEN PAD (PROPOSED)
MADRID N ORE PAD
MADRID N WASTE ROCK PAD (NORTH)
NAARTOK W INFRASTRUCTURE PAD
NAARTOK E INFRASTRUCTURE PAD
CONTACT WATER POND 3 (QUARRY D)
NAARTOK PIT SUMP
MMS-11
PATCH 7 WASTE ROCK PAD
CONTACT WATER POND 4 (PATCH 7)
PATCH 7 ORE PAD
MMS-12
MADRID SUMP 6
PATCH 7 INFRASTRUCTURE PAD
MADRID S ORE PAD
SEWAGE TREATMENT
MADRID CAMP
PRE-TREATMENT
CONTACT WATER POND 5 (MADRID S)
MADRID S WASTE ROCK PAD
MADRID S INFRASTRUCTURE PAD
CONTACT WATER POND 6 (MADRID S)
OGAMA LAKE
PO LAKE
PATCH LAKE
GLENN LAKE
WINDY LAKE
IMNIAGUT LAKE
WOLVERINE LAKE
MADRID N OVERBURDEN PAD (EXISTING)
MADRID MINE
LEGEND
FLOW TYPES
GRAVITY/PASSIVE
PUMPED OR HAULED
SEEPAGE OR GROUNDWATER
CONTINGENCY
SOLIDS
WATER MANAGEMENT PLAN
EXISTING
PERMITTED (2017 FEIS)
PROPOSED REVISION (2024 FEIS)
PROPOSED ADDITION (2024 FEIS)
MONITORING STATIONS AND PREDICTIVE NODES
FLOW USED FOR INPUT, WQ DATA USED FOR VALIDATION
WATER LEVEL AND WQ DATA USED FOR VALIDATION
PREDICTIVE NODES
DISCHARGE POINTS
TUNDRA
ROBERTS BAY
NOTES
GENERAL NOTES: ALL CATCHMENT AREAS, PONDS, AND SUMPS RECEIVE INFLOWS FROM UP-GRADIENT LOCAL CATCHMENTS. ALL POND AND LAKE SURFACES ARE SUBJECT TO DIRECT PRECIPITATION AND EVAPORATION. DISCHARGE TO TUNDRA AND ROBERT'S BAY ONLY POSSIBLE WHEN WATER QUALITY CRITERIA ARE MET.
1. TSS TREATMENT IMPLEMENTED JULY 2022.
2. FILTERED TAILINGS STACK PLANNED FOR LATER YEARS OF MINE LIFE.
3. DORIS ORE PADS Q AND HJ.
4. DORIS WASTE ROCK PADS T AND I. PAD U TO BE CONSTRUCTED 2025.
5. DORIS SITE PADS INCLUDE SITE BUILDINGS, INFRASTRUCTURE, AND LAYDOWNS.
6. ANCILLARY FACILITIES INCLUDE FUEL TANK FARM, LANDFARM, AND LANDFILL.
7. ACTIVE WATER MANAGEMENT FOR QUARRIES A AND B. QUARRY 5 TO BE DEVELOPED STARTING IN 2024. QUARRIES E, AI, AND AF TO BE EXPANDED DURING CONSTRUCTION.
8. QUARRY D TO BE USED AS TEMPORARY HOLDING AND TRANSFER POINT FOR MADRID NORTH MINE WATER PRIOR TO PUMPING TO QUARRY 3 SALINE POND.
srk consulting
AGNICO EAGLE
PROJECT NUMBER CAPR003305
REVISION 02 -DRAFT
DRAWN BY NF/BPR
REVIEWED BY BRS
APPROVED BY CJ
DATE 2025-01-20
FIGURE NO. 2
TITLE HOPE BAY PROJECT MINE PLAN OPERATIONAL UPDATE WATER AND LOAD BALANCE FULL-SCALE PRODUCTION

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-06**
Re:	**Clarity for burning at the Boston site**		

Request Made by Interested Party:

ECCC recommends that the Proponent delete the sentence "Instead, there is a burn pan for combustible materials." from Section D1.2 Incinerator Management at Boston of the document Hope Bay Operational Update Appendix 6-H: Incinerator and Composter Waste Management Plan to be consistent with Agnico Eagle's response to ECCC-IR-03.

Agnico Eagle's Response to Request:

Agnico Eagle would like to reiterate that Boston and its associated scope of activities are outside the scope of the 2AM-DOH Water Licence Amendment and therefore should not be considered in this technical review. Comments of this nature are suitable for the normal course NWB annual reporting processes, which is occurring separately and in parallel with the amendment process. However, we acknowledge that the Incinerator and Composter Waste Management Plan is a site wide Hope Bay document which includes specifics for the Boston site. For transparency, there is a burn pan and incineration at Boston (under the 2BB licence; again out of scope of this application). The next version of the plan will be updated to reflect current practices.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-07**
Re:	**Emergency Response and Crisis Management Plan**		

Request Made by Interested Party:
ECCC recommends that the Proponent verify that the text describing a level two incident is accurate and update if necessary.

Agnico Eagle's Response to Request:
Agnico Eagle thanks ECCC for raising this inconsistency and confirms it was an editorial error when revising the format of the plan from its previous version. In the next version of the Emergency Response and Crisis Management Plan, Section 3.2 will be updated to reflect the following text:

> ***3.2 Level Two – Local Event but Requires Assistance to Resolve***
> *A level Two Emergency has the following characteristics:*
>
> - *Can be handled by employees who respond with help from their managers or fellow employees who have been called in before normal operations can resume; and*
> - *IC will alert Manager on Duty to Activate the Emergency Management Team. Generally, will require a site wide shutdown until the situation is under control.*
>
> ***Notification**: General Manager same day as event & Corporate office shall be notified in the normal reporting.*

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-08**
Re:	**Spill Contingency Plan**		

Request Made by Interested Party:

ECCC recommends that the Proponent update the citation for the Emergency Response Guidebook to the 2024 version in the next version of the Spill Contingency Plan.

Agnico Eagle's Response to Request:

As per response to completeness checks, Agnico Eagle reiterates the commitment to update the citation for the Emergency Response Guidebook to the 2024 version in the next version of the Spill Contingency Plan.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-09**
Re:	**Hazardous Waste Management Plan**		

Request Made by Interested Party:
ECCC recommends that waste substances with a higher risk of leaks or spills be stored with secondary containment that would minimize the likelihood of leaked or spilled substances reaching the environment. For waste streams that encompass both higher risk (e.g., liquids) and lower risk (e.g., solids or substances with residual contamination) wastes, specify which storage method would be used for which type of waste (e.g., waste oils would be stored on a concrete containment pad with sump, while waste drained filters, rags, and absorbent pads are stored within a sea can).

Where landfarming is not effective to achieve discharge criteria, ECCC recommends exploring alternative methods of remediation (see previous comment on completeness check ECCC-IR-01) for contaminated soil, gravel, and rock, before backfilling these materials underground.

Agnico Eagle's Response to Request:
Agnico Eagle directs ECCC that information regarding waste storage management is addressed in Table 4.1 of the Hazardous Waste Management Plan (Appendix 6-F), which identifies storage requirements based on the risk profile of each waste stream. The information from Table 4.1 of the Plan is summarized:

- Higher-risk liquid wastes, including waste fuels, waste oils, glycol, and solvents, are stored in appropriate containers on concrete containment pads with sumps.
- Lower-risk solid wastes, such as drained filters, rags, and absorbent pads, are stored in sea cans or approved containers.
- Batteries are stored in UN rated containers within secondary containment.
- Contaminated materials are stored in impermeable containers and, where required, on containment pads with sumps or within sea cans.

Additional secondary containment measures are used as necessary to prevent releases to the environment.

Agnico Eagle acknowledges ECCC's recommendation to consider alternative remediation methods where landfarming is not effective. As previously stated in response to ECCC-IR-01, ECCC's comments will be considered during development of the Final Closure and Reclamation Plan. See also ECC-TRC-10.

Interested Party:	**ECCC**	**Rec No.:**	**ECCC-TRC-10**
Re:	**Hydrocarbon Contaminated Material Management Plan**		

Request Made by Interested Party:
ECCC recommends that the Contaminated Material Management Plan include, as appropriate, alternative methods of remediating contaminated materials.

Agnico Eagle's Response to Request:
Agnico Eagle reiterates that technical considerations will be provided in the Final Closure and Reclamation Plan during the design of the contaminated soil containment and remediation plan; however, we agree that acknowledgement of alternative methods of remediation can be added to Section 7 of the Hydrocarbon Contaminated Material Management Plan.

The following text (bold) will be added in the next version of the Hydrocarbon Contaminated Material Management Plan.

> **7. Contingencies**
> Should additional contaminated material not be able to be placed underground for any reason, and therefore require storage that exceeds the capacity of the site facility, a temporary lined facility may be required to store the excess material. Alternatively, it may be transported to the TIA or temporarily stored on a suitable liner or in appropriate containment until the final remediation option is determined. **Some alternative remediation options could include biopiles, low-temperature thermal desportion, soil vapour extraction, and soil amendments.** In some cases, the material will be packaged for off-site disposal via sealift to a licenced remediation/disposal facility.

FISHERIES AND OCEANS CANADA (DFO)

Interested Party:	DFO	Rec No.:	DFO-TRC-01
Re:	Response Framework / Action Levels for Water Quantity		

Request Made by Interested Party:

DFO requests that the proponent provide an updated AEMP that includes action levels for water quantity thresholds in all potentially effected lakes and streams. Should monitoring indicate that levels are approaching that which will be authorized in this amendment process or that of DFO's internal process, the Proponent must have contingencies, such as slowing or stopping water withdrawal or switching to another authorized waterbody if necessary, to avoid unauthorized impacts. DFO expects that the Proponent will identify appropriate action levels and response frameworks to be reviewed by the NWB, DFO, and other parties.

Agnico Eagle's Response to Request:

The AEMP will be updated to include action levels (Low, Medium and High) for water quantity thresholds for waterbodies where water withdrawals are proposed for the Operational Update (Patch, Windy, Doris). The Water Quantity Response Framework will follow similar structure as the current Water Quality Response Framework whereby monitoring data would be used to determine whether a Low Action Level Response is triggered. Additional monitoring outlined in DFO-TRC-03 may be implemented to support the Response Framework. The Low Action Level Response Plan will be largely investigative and will include some of the contingencies proposed above by DFO to improve the mitigation or avoidance of a Mine-Related effect on water quantity. Confirmation of a Mine-Related Low Action Trigger would then initiate the development of medium and high-level Action level Response Plans within the AEMP.

If an action level exceedance is observed, a Response Plan will be prepared and submitted to the NWB. The Plan is a living document and may be updated based on regulatory changes, Mine-related changes, or changes to existing mitigation measures, with updates submitted to the NWB, DFO and other parties.

Interested Party:	DFO	Rec No.:	DFO-TRC-02
Re:	Additional Hydrology Modelling and Water Withdrawal Information Required for Review		

Request Made by Interested Party:

DFO cannot complete a thorough review of the proposed amendment until additional hydrology information and modelling data have been provided.

As stated in the Conceptual Offsetting Plan (Appendix 6-Q) of the amendment application, "Estimated fish habitat losses for Patch outflow, Ogama Inflow and Outflow, and Little Roberts Outflow are from the FEIS and will be updated once the hydraulic modelling results become available for these areas." The Proponent states that the results of said modelling will provide key information regarding the potential delay in the open water season for Little Roberts Outflow. Once the updated modelling results become available, DFO will review the information and provide comments. Until then, DFO is unable to complete their review of the amendment application.

Additionally, DFO requires further information regarding the 60,000 m3/year water withdrawal proposed from proximal sources. DFO requests the Proponent provides the location of the proximal sources, lake volumes of these sources, confirmation of adherence to DFO guidelines for water withdrawal (i.e., intake screens, under ice, and flow thresholds), and monitoring and reporting associated with this withdrawal. Further information about the waterbodies from which the 60,000 m3/year will be withdrawn is required to confirm all DFO guidelines are being followed and no additional impacts to fish and fish habitat occur as a result of the proposed water withdrawal from these proximal sources.

DFO is unable to complete a full assessment of the impacts on fish and fish habitat until this information is provided. DFO will require this information for the assessment of the project during DFO's Fisheries Act Authorization process. However, DFO is of the opinion that the results of the described modelling is pertinent to the NWB water license and should be considered during the amendment process.

Agnico Eagle's Response to Request:

Agnico Eagle completed water balance and hydraulic modelling for the freshwater withdrawal source lakes (Doris, Patch, and Windy) to assess potential effects on fish and fish habitat within each waterbody and its respective outflow. The supporting information is provided in Appendix 4-C and Appendix 6-Q of the Water Licence Amendment Application.

As noted in this technical review comment, where updated water balance and/or hydraulic modelling results were not yet available, estimates of fish habitat loss from the 2017 Madrid-Boston FEIS were used as a surrogate. This approach provided a preliminary and conservative indication of potential fish habitat losses pending completion of the updated modelling.

Table 3.1 of Appendix 6-Q provides a qualitative comparison of anticipated residual effects requiring offsetting for the Operational Update relative to the 2017 Madrid-Boston FEIS assessment. This comparison is based on the modelled effects for Doris, Patch, and Windy lakes. For locations in the Conceptual Fisheries Offsetting Plan where FEIS-based fish-habitat loss estimates were used as a surrogate, Agnico Eagle anticipates that the estimated losses will decrease once hydraulic modelling is completed, with the exception of Little Roberts Outflow.

Agnico Eagle will continue to advance the Conceptual Fisheries Offsetting Plan toward finalization and will provide the updated assessment to DFO through the anticipated Request for Review and Fisheries Act Authorization application process.

In response to DFO's second request regarding water withdrawals from proximal sources, Agnico Eagle refers to the written response to CIRNAC-TRC-07. In summary, winter ice road construction and the use of proximal sources to construct these roads was added to the Licence during the 2018 Water Licence Amendment. Agnico Eagle will continue to follow the *DFO Protocol of Winter Withdrawal from Ice-Covered Waterbodies in the Northwest Territories and Nunavut*, which includes submitting the required information to DFO for review and concurrence prior to program commencement. In addition, water use is reported on annually, per the Licence conditions.

Interested Party:	**DFO**	**Rec No.:**	**DFO-TRC-03**
Re:	**Freshwater Withdrawal Monitoring**		

Request Made by Interested Party:

DFO requests additional information regarding the monitoring of impacts associated with the proposed increased freshwater withdrawal.

Following DFO's recent review of the 2025 Hope Bay Annual Report, additional concerns have arisen regarding under ice monitoring. As stated in the 2025 AEMP Report for the Hope Bay Mine, "water levels and ice thickness measurements during the 2025 ice-covered season (a fish habitat variable) could not be evaluated for Glenn, Imniagut, PO, Ogama, and Little Roberts lakes due to weather and safety concerns". It is later noted that the lack of data was due to thin ice. All previously listed lakes should be sampled due to potential effects from drawdown or water withdrawal impacts following the current AEMP.

DFO is concerned that despite these lakes being included in the monitoring program in the proposed AEMP (Appendix 6-A) associated with the amendment, the feasibility of monitoring is limited, as highlighted by the lack of monitoring data presented for 2025. Of significant concern is the downstream lakes (i.e., Little Roberts Lake and Glenn Lake) that will experience increased effects on water level due to proposed increased withdrawal from Doris Lake and Windy Lake. DFO questions how under ice monitoring at these locations will occur if weather and safety concerns are an issue in the long-term. DFO requests the Proponent provide confirmation that the aforementioned lakes will be monitored as stated in the proposed AEMP and provide a contingency monitoring plan in the event that similar weather and safety concerns arise in the future.

Additionally, DFO recommends the proponent to establish a continuous monitoring station on Patch and Windy Lakes once water withdrawal commences like the monitoring occurs at the station located on Doris Lake. DFO believes that the establishment of continuous monitoring stations on Patch and Windy Lakes could mitigate the potential challenges of under ice monitoring with safety concerns associated with thin ice. This data could also be of benefit to provide information for the assessment of the anticipated impacts associated with increased water withdrawal.

Finally, while the Proponent states manual stream flow measurements will be made annually across the open water periods (both high and low flow periods), DFO remains concerned with the proposed level of monitoring knowing that there is an expected delay in timing of and the reduced open water period as a result of the associated changes in water withdrawal (i.e., 20% reduction in open water period in Doris Creek). As such, DFO requests that more intensive monitoring be conducted for Doris Creek in the spring to verify the modelled impacts and confirm that the delay in open water does not exceed what will be authorized in this amendment process and within DFO's internal review as part of the projects Fisheries Act Authorization process.

Agnico Eagle's Response to Request:

Agnico Eagle recognizes the importance of carrying out the AEMP annually as outlined in the approved management plan during the Operations phase. However, Agnico Eagle notes that the mine was in Care and Maintenance when the winter monitoring parameters (ice thickness and/or under-ice water level measurements) could not be collected, and these events are not reflective of the current application.

Agnico Eagle reiterates that the modelled reduction in under-ice lake volume for Windy and Patch Lake in May with the Operational Update are -1.8% and -0.2%, respectively (Appendix 4-C of the Water Licence Amendment application). However, the feasibility of establishing continuous monitoring stations on Patch and Windy lakes in coordination with water withdrawal activities will be evaluated through updates to the AEMP. An assessment of feasibility may be included as a special appendix to the AEMP annual report. Agnico Eagle notes that the establishment of effective continuous monitoring stations is dependent on bank and near-shore bathymetric characteristics.

Regarding DFO's suggestion for more intensive monitoring to be conducted on Doris Creek to verify modelled impacts (i.e. effects on the timing in open-water season), Agnico Eagle believes the existing monitoring through the AEMP to be suitable to validate predicted effects. This is because lake levels are monitored continuously in Doris Lake, and the outflow is monitored frequently approaching freshet to inform the start of the AEMP freshet monitoring.

Interested Party:	**DFO**	**Rec No.:**	**DFO-TRC-04**
Re:	**Request for Blast Vibration Monitoring Plan**		

Request Made by Interested Party:
DFO retains its position that a detailed blast monitoring plan should be provided for this project, for all blasting activities taking place near fish bearing waters.

Agnico Eagle's Response to Request:
As noted in response to DFO-IR-06, Agnico Eagle follows the applicable blasting protocols in place for the project, which include DFO guidelines DFO guidelines for blasting and mitigations for fish habitat, a record of compliance data are maintained, and a summary is provided through the Annual Reports.

Starting with the 2026 Annual Report, Agnico Eagle will provide a Blast Monitoring Report as an appendix to the NWB and NIRB Annual Reports. The report will be in accordance with NIRB Project Certificate No.003 Condition 29, and NIRB Project Certificate No.009 Condition 14. The purpose of the report will be to:

- Confirm compliance with The Guidelines for the Use of Explosives In or Near Canadian Waters (Wright and Hopky, 1998) as modified by the Department of Fisheries and Oceans Canada (DFO) for use in the North, and adhere to guidance provided in Monitoring Explosive Based Winter Seismic Exploration in Waterbodies (Cott and Hanna, 2005).
- Document monitoring methods and results to evaluate blast related peak particle velocity (PPV).
- Document monitoring methods and results to evaluate instantaneous pressure change (IPC) to protect nearby fish bearing waters.
- Document monitoring locations.
- Document number of surface and/or underground blasts relative to PPV and IPC.

Report structure will be similar to that prepared for Meliadine and Meadowbank Complex mines with an introduction, methods (monitoring instruments, locations), and results (PPV, IPC by location, number of blasts in calendar year).

Interested Party:	**DFO**	**Rec No.:**	**DFO-TRC-05**
Re:	**DFO Offsetting Requirement**		

Request Made by Interested Party:

In summary, the current conceptual offsetting proposal is not sufficient to demonstrate compliance with the Fisheries Act, the Regulations, and DFO's Offsetting Policy. A revised approach that meets these requirements will be necessary should the proponent pursue an authorization.

Agnico Eagle's Response to Request:

As noted by DFO, Hope Bay Mine Fisheries Offsetting Plan (Appendix 6-Q of the Water Licence Amendment application) is conceptual in nature and has not been reviewed or approved by DFO as part of an application of a *Fisheries* Act Authorization. We understand that additional work will be required to support the authorization application process. However, in our view the information provided in the amendment process is sufficient to meet the relevant needs of the Water License amendment.

The proposed offsetting measure has been identified and developed with input from DFO, the KitIA, and the Hope Bay Inuit Environmental Advisory Committee (IEAC). These parties were included in engagement on the offsetting plan that has been conducted from 2017 to 2023, with engagement to continue in 2026 (Appendix A of Appendix 6-Q).

Additional field programs are being conducted in 2026 to support the development and selection of the design for the culvert modifications, and the end-design will reflect the most appropriate measure to achieve offsetting measures, with durability and long-term maintenance requirements as a consideration.

ATTACHMENT A: RESPONSES PROVIDED TO CIRNAC ON JUNE 18, 2026

AGNICO EAGLE

June 18, 2026

Andrew Keim
Manager
Water Resources, Nunavut Regional Office
Crown-Indigenous Relations and Northern Affairs Canada

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

Dear Mr. Keim,

Based on the meeting of June 4-5, 2026, Agnico Eagle is providing additional information to CIRNAC regarding the 2AM-DOH1335 Water Licence Amendment – Operational Update – Information Requests / Completeness Check. Specifically, this is additional information are related to CIRNAC comments on CIRNAC-IR-8c; -14; -25; and 37a) and b). In the enclosed, we have provided previous responses to request in italics for completeness.

To re-iterate, approved infrastructure for the Hope Bay mine has already been reviewed through a public process, and while information of existing infrastructure may be provided to support the reviewer, it is the expectation that the review will focus on the new or amended items described in the Application. It would not be efficient to focus comments and discussion on existing and approved Project components and activities that are not changing, particularly given that these items can and should be reviewed during the annual reporting process or site inspection process.

On May 7, 2026, the NWB reconfirmed our application is administratively complete, and this occurred again verbally on June 16, 2026 at the NWB meeting attended by CIRNAC, Agnico Eagle, and KivIA. This is a very important and clear determination that is entirely within the jurisdiction granted to the NWB under the Nunavut Agreement and the Act.

We would like to highlight the following key passage of the May 7 letter, as it directly relates to the topic of continuing requests for more information on current licensed activities and infrastructure that are <u>not</u> changed as a result of the proposed amendment:

> *"With respect to CIRNA's position specifically about requiring submission of information and updates in relation to existing and previously approved activities/infrastructure, the Applicant has identified in the Amendment Application that many previously approved activities/infrastructure will remain unchanged. If no changes to previously approved activities/infrastructure are requested, the NWB does not require resubmission in the Amendment Application of*

> *information that is already on the public registry for the Licence such as technical information from the original applications and renewals, monitoring information and previously approved plans, etc."*

In this passage, the NWB was very clear that Agnico Eagle is not required to resubmit information about our project that is already approved and not proposed to change, particularly given that information is already on the NWB registry.

In its letter, the NWB went on to state that:

> "*The Board highlights, however, that the onus remains on the Applicant to provide the Board and parties with sufficient information to support their requested amendments to the existing Licence. For example, if the Applicant, during technical review of the Amendment Application determines that significant changes to the existing/previously approved activities/infrastructure are required, the Board retains the discretion to request additional information and suspend the Board's consideration of the Amendment Application until sufficient information and technical review of the information necessary to support such requests is made."*

Again, the Board is very clear in its NWB Completeness Determination that it is only significant changes to the existing/previously approved activities/infrastructure that requires Agnico Eagle to submit additional information. The information that CIRNAC continues to seek is on project aspects that Agnico Eagle has repeatedly confirmed are not changing. The paragraph above indicates that additional information is only required where Agnico Eagle is seeking changes. The NWB have determined that the SIG has been complied with to the extent it is relevant to this particular application. The NWB reconfirmed that CIRNAC's interpretation is incorrect in that respect on our call of June 16.

Respectfully, we ask that CIRNAC defer to the NWB jurisdiction over its process and consider its outstanding IR requests relaying to the SIG and unchanged approved Project infrastructure and activities resolved. Continuing to raise non substantive topics of this nature (that have already been decided by the Board) detracts from our shared goal of trust and clarity in the licensing process, and causes confusion to all participants. We ask that in your technical comment submission that CIRNAC refocus away from the SIG and instead focus on the core substantive topics in this amendment application. This is especially crucial given the importance of the restart of the Hope Bay Project to Canada, Nunavut, the Kitikmeot Region and Nunavummiut.

With respect to the specific IRs listed in your email:

Re: IR-01d, IR-03, IR-12, IR-15, 1R-18, IR-19c, IR-19d, IR-21, IR-22, IR-33: These IRs are not about anything specific to the amendment that is the subject of this process. They are about existing unchanged approved project elements. As an example we have confirmed to you, through this process, that methods of water extraction are not changing and that we are following the existing water licence, which CIRNAC's Minister previously approved and which was based on the thorough previous NWB processes CIRNAC participants

in. CIRNAC is well aware of culverts, roads, crossings etc. because they have been reviewing this documentation for decades and they regularly inspect the site. The NWB has already determined that our application does not require any further information to comply with the applicable NWB policy and procedures (including the SIG). We respect the Board's procedural determination and ask that CIRNAC do the same and mark these items as resolved in your comments due this week.

Re IR-04: NWB staff have indicated that all parties can rely on the registry and Agnico Eagle is respectful of that decision. It would be duplicative and confusing to add hundreds of pages to an application repeating things thar are already part of the procedural record that Agnico Eagle is not proposing to change. Again, we ask CIRNAC to follow the direction that the NWB has already issued on this item. Again, we believe this should be considered "resolved".

Re IR-27: As we have explained, this document is not relevant to CIRNAC's review. This is not an assessment process but a licensing process of our specific application. Agnico Eagle has presented the alternative that it wishes to proceed with. This process is focused on confirming that alternative can proceed. Again, we believe this should be considered "resolved".

Re IR-29: This IR is resolved by simply following the licence as written in due course and does not require more information as part of this technical review. Agnico Eagle will continue to follow the NWB licence requirements which provides clearly at Part B item 15: "*15. The Licensee shall review the Plans referred to in this Licence as required by changes in operation and/or technology and modify the Plans or Manuals accordingly. Revisions to the Plans or Manuals are to be summarized and submitted in the form of an Addendum to be included with the Annual Report required by Part B, Item 2, complete with a revisions list detailing where significant content changes are made*." Again, we believe this should be considered "resolved".

Regards,

Colleen Prather
colleen.prather@agnicoeagle.com
Superintendent, Permitting & Regulatory Affairs

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-IR-08**
Re:	**Drainage Pathways**		

Request Made by Interested Party:

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).

Agnico Eagle's Response to Request (June 18, 2026):

As noted in the April 24, 2026 response, Quarry 2 and the waste management infrastructure within the Quarry are previously approved infrastructure that have gone through the appropriate review process; this includes the landfill. Agnico Eagle is providing Figure 5-2 from the Non-hazardous Waste Management Plan (January 2025) showing the location of the landfill in Quarry 2, plan view and design details. The landfill was approved on April 25, 2025 (417 days ago as of June 16, 2026).

The details are provided for the readers information and is not part of Application scope.

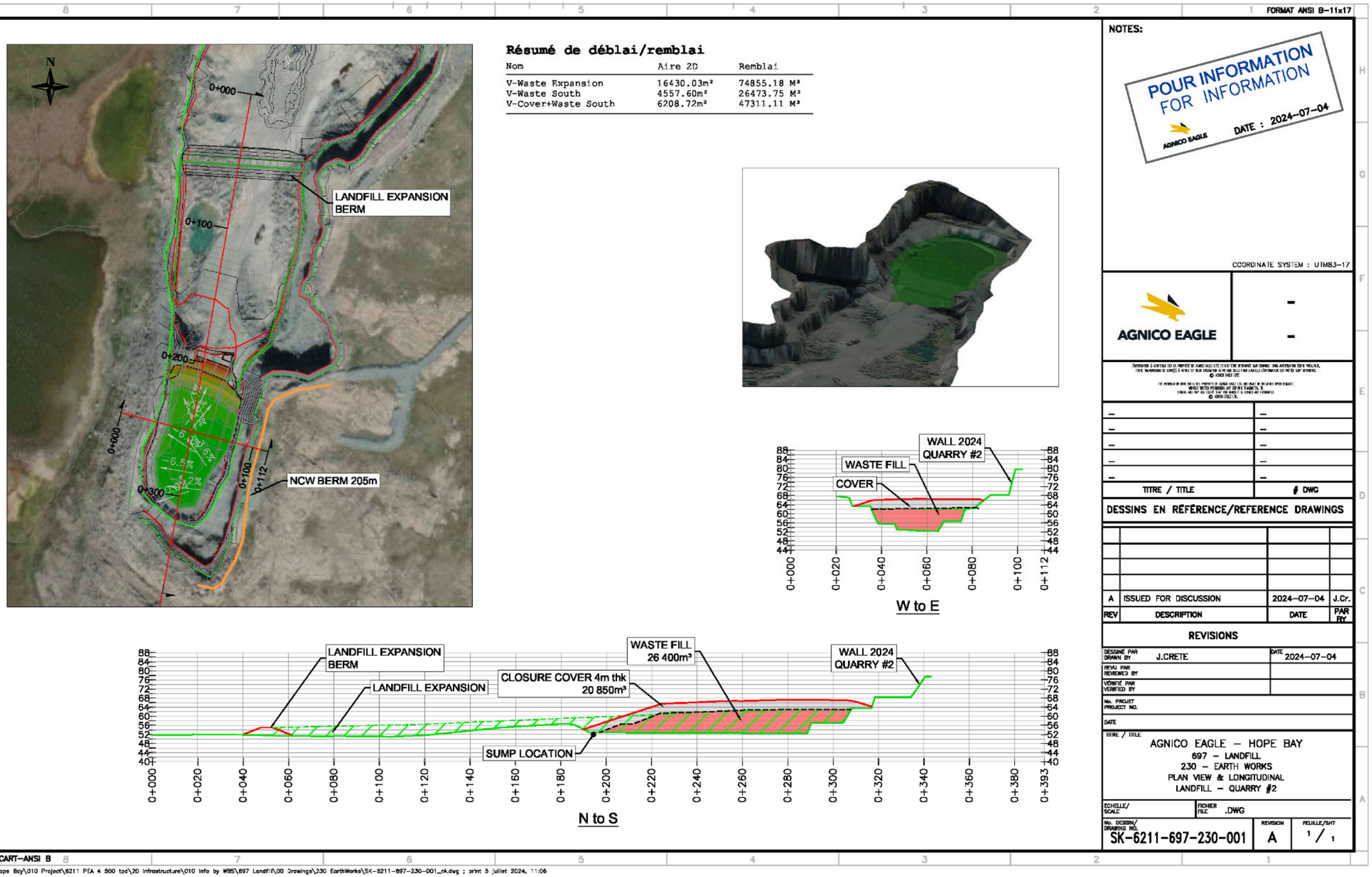


Figure 5-2 **Quarry 2 Landfill Plan View and Design Details**

Previous Responses to CIRNAC-IR-08

Agnico Eagle's Response to Request (April 09, 2026):

Figures 1.2-1 to 1.2-4 referenced under Section 4-1c of the SIG highlights the areas of infrastructure for the Water Licence Amendment. In addition, the local and regional project areas for the Operational Update are the same areas as those from the 2017 FEIS and the current water licence. The reader is referred to drawings from the FEIS that show local and regional watershed boundaries.

Response to bullet 8a)

Regional watersheds are available in Volume 5, Section 1 of the Madrid-Boston 2017 FEIS (Fig 1.2-2; NIRB ID: 314856).

Response to bullet 8b)

Local watersheds are available in Volume 5, Section 1 of the Madrid-Boston 2017 FEIS (Fig 1.2-2; NIRB ID: 314856). Drainage patterns in the LPA are available in Figure 3.1 of Appendix 6-Q of the Water Licence Amendment application.

Response to bullet 8c)

Figure 3-1 of Appendix 4-F provides drainage patterns associated with the mine infrastructure, including solid waste disposal areas.

Agnico Eagle's Response to Request (April 24, 2026):

Response to bullet 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.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-IR-14**
Re:	**Watercourse Flow Rates**		

Request Made by Interested Party:
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.

Agnico Eagle's Response to Request (June 18, 2026):
CIRNAC requested flow statistics to evaluate the potential effects of water withdrawals on the receiving environment, specifically, mean annual flood, maximum summer flood and mean summer flood in cubic metres per second for Doris, Patch and Windy Lake outflows.

Agnico Eagle provided information in Appendix E of Appendix 6-Q of the Operational Update Water Licence Amendment application to support assessing the effects on Doris, Windy and Patch outflows from the proposed changes to the approved mine. Modelled mean daily discharge is provided in Tables A1, A2, and A3, and mean monthly and annual discharge are provided in Tables 2-10, 2-11, and 2-12. Agnico Eagle provided relevant flow statistics to allow reviewers to assess the effects of the Operational Update on streamflow across various periods and flow conditions.

====

Previous Responses to CIRNAC-IR-14
Agnico Eagle's Response to Request (April 9, 2026):
Agnico Eagle thanks CIRNAC for the recommendation and will address this IR through the technical phase of the Water Licence Amendment application.

Agnico Eagle's Response to Request (April 24, 2026):
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.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-IR-17**
Re:	**Water Management Plan**		

Request Made by Interested Party:
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.

Agnico Eagle's Response to Request (June 18, 2026):
Based on the discussion with CIRNAC, and clarification of the IR, it is our opinion that only clarification notes are required at this point.

As suggested in the April 9, 2026 response it is expected that an update to the water management plan will be required following the completion of the Water Licence Amendment. This is to ensure that all technical comments are captured appropriately. This is a consistent and accepted practice followed through NWB Water Licence Amendments. There are many examples of this approach being applied by NWB in the past. This avoids duplication. Again, we believe this should be considered "resolved". The current WMP is on the NWB public registry, if you have a personal interest in the background. 250129 2AM-DOH1335 Agnico Eagle Responses to Second Comments on SWSP-ILAE.pdf. The Annual Reports (which CIRNAC reviews and comments on as part of the annual process) are here: https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1335%20AEM/3%20TECH/I%20MONITORING/

The current Water Management Plan is robust enough and effective for the current Hope Bay site.

The minor edits identified for the future management plan update are provided in Table 1 below.

Table 1: Summary of Changes for Updates to the Water Management Plan

IR No.	WMP Section No. and Title	Comment/Note	Current Text	Update to be Implemented following Issuance of the Water Licence Amendment
17a	3.1.3.1. Operation	Flow is always through Saline Pond 1, then through treatment and discharge to Roberts Bay. This has been clarified in the text.	Mine water (water that is pumped or flows out of underground workings) will be collected in underground sumps and pumped to surface, from where it will be treated and discharged to Roberts Bay, either directly, or via Saline Pond 2.	Mine water (water that is pumped or flows out of underground workings) will be collected in underground sumps and pumped to surface, from where it will be treated and discharged to Roberts Bay, via Saline Pond 1.
17b		Water used in the mill (i.e., process water) is sourced from the Reclaim Pond and Doris Lake. It is then discharged to the TIA, as depicted in the process flow diagram. Water sourced from Doris Lake is not process water and is considered fresh water prior to entering the process plant.		No change required in Plan
17c	3.2.3.1. Operation	Clarification added to text. Note that the Doris Sediment Control Pond will be renamed to CWP 1A in the next revised WMP. Change in nomenclature is intended to standardize pond notation.	The CWP 2 will always be operated in a manner allowing pumping to commence as soon as the containment volume is large enough for one continuous hour of pumping. All water will be transferred to the TIA.	The CWP 2 will always be operated in a manner allowing pumping to commence as soon as the containment volume is large enough for one continuous hour of pumping. All water will be transferred to the TIA, via Doris CWP 1A.
17d	3.2.5. Sumps	Correction made to clarify that Sump 1 is upstream and not downstream of CWP1	Sump 1 is constructed downstream of the Sedimentation CWP 1, downstream of the south-east corner of the facility.	Sump 1 is constructed upstream of the CWP 1A, downstream of the south-east corner of the facility.
17e	3.2.6.1. Operation	CIRNAC's interpretation of the text is incorrect. The text in section 3.2.6.1 reads that process water, in excess of what is required in the process plant, may be discharged to Roberts Bay from the TIA. Flow stream cited by CIRNAC showing flow from the TIA to the process plant is reclaimed water being pumped back to the process plant.		No change required in Plan
17f	3.2.8.1. Monitoring	CWP 1A is the intermediary pond designed to reduce sediment and polish water sent to the TIA. Therefore, all flows from contact water sources are routed through this sediment control pond prior to going to the TIA.		No change required in Plan
17g	3.2.11. Various Use	CWP 1A is again the intermediary pond designed to reduce sediment and polish water sent to the TIA. All flows from contact		No change required in Plan

IR No.	WMP Section No. and Title	Comment/Note	Current Text	Update to be Implemented following Issuance of the Water Licence Amendment
	Containment Sumps	water sources are routed through the sediment control pond prior to going to the TIA.		
17h	4.1.3. Mine Water	Noted.		Process flow diagram will be updated to show potential for inflow from Windy Lake to Madrid, as an option.
17i	4.1.5. Treated Sewage Water	The Water Management Plan is intended to depict current conditions, describing water management infrastructure and strategies/methods for managing water today. The Water Licence Amendment Application depicts a scenario to demonstrate the upper bound water balance and water quality performance of the site. Some of these components may or may not be realized during actual operation of mine. The Water Management Plan will then be updated accordingly when these components are to be integrated into the system. For the time being, Agnico Eagle does not have a camp at Madrid and sewage water is trucked to Doris. However, if Agnico Eagle chooses to construct a camp (up to 250 occupancy) in Madrid, subsequent sewage treatment plant will also be constructed as depicted in the process flow diagram.		No change required in Plan
17j	Table 4-1		Sump 1	Sump 3
17k	Table 4-1	Naming convention clarified as Madrid North contains a north and south WRSF, each separate from one another.	Sump 1	Sump 5
17l	Table 4-1	Naming convention clarified as Madrid North contains a north and south WRSF, each separate from one another.		Sump 1
17m	Table 4-1	Currently, water reports to CWP3 until the pipeline connecting Doris and Madrid mine sites is commissioned, when it is possible to directly pump to the TIA.		No change required in Plan
17n	Figure 1 Water management Flow Diagram – Doris and Madrid	Note that many of the infrastructure referenced in this comment are not yet approved by the NWB, and are part of this Water Licence Amendment. For example, ponds not currently permitted include CWP4, Sump 6, CWP5, and CWP6. Once approved and constructed, these infrastructure will be added to the Water Management Plan body and the descriptive text will also be updated accordingly.		No change required in Plan

=====

Previous Responses to CIRNAC-IR-17

Agnico Eagle's Response to Request (April 9, 2026):

Agnico Eagle appreciates the comment from CIRNAC and assumes an update to management plans will be required following completion of the Water Licence Amendment to ensure all technical comments are captured appropriately. For this application (Operational Update, and plans to restart operations) refer to the Water and Load Balance Model (Appendix 4-F) and the Doris-Madrid Water Management Plan(Appendix 6-P).

Agnico Eagle's Response to Request (April 24, 2026):

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 4F). 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. 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. 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.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-IR-25**
Re:	**Waste Generation: Quality and Quantity**		

Request Made by Interested Party:
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.

Agnico Eagle's Response to Request (June 18, 2026):
As per the details provided in the Application Form, Agnico Eagle had indicated the quantity of material generated for domestic waste and contaminated soil/snow will vary yearly depending on the operation. We continue to maintain this position. In particular with contaminated soil/snow. Our primary objective is for no spills; however, we recognize spills do occur. Which is why we have approved management plans (Spill Contingency Plan, Hydrocarbon Contaminated Material Management Plan) in place to address and manage accordingly within approved facilities.

Similarly, the Non-hazardous Waste Management Plan will be followed and waste generated will be managed accordingly within approved facilities.

However, as discussed on June 4, 2026, Agnico Eagle is providing estimated quantities of waste for these two items. As per previous responses provided, items such as contaminated soil and domestic waste will vary year by year, and will depend on circumstances throughout the year. Actuals are reported annually.

The following table includes updates from April 24 response, and estimated quantities per discussion on June 4, 2026.

Type of Waste	Composition	Quantity Generated	Treatment Method	Disposal Method
Sludge Water[(a)]	Domestic sewage	209 m^3/day	STP	Water from the external lift station enters the STP and is screened at the screening system. The screened water gravity drains to a collection tank under the screen system and is pumped to the Equalization (EQ) tanks. When the EQ tanks reach a set level, the EQ pumps send water to the aerobic tank. This water is processed by the membrane bioreactor system (MBR), disinfected by UV units, and gone through a reuse water tank before discharge.
Domestic Waste[(b)]	Non-salvageable, non-hazardous, non-putrescible solid wastes	850 m^3/year during operations	None	Continue to use Landfill
Contaminated Soil / Snow[(b)]	Soils, rock, ice, and snow contaminated by light hydrocarbons	250 m^3/year during operations	Bioremediation	Continue to use approved Landfarm

a) Provided in April 24, 2026 response to comments; additional information included in this table

b) Updated quantity generated following June 4, 2026 meeting. While this waste will vary yearly; estimates are provided based on other Agnico Eagle operating mines. Actuals are reported annually through NWB Annual Report

====

Previous Responses to CIRNAC-IR-25

Agnico Eagle's Response to Request (April 9, 2026):

Additional details were provided in Block 15 of the Application Form. Where possible, Agnico Eagle can provide further information during the Technical Comment phase.

Agnico Eagle's Response to Request (April 24, 2026):

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 m^3/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 m^3 of industrial waste, with a flexibility for a second phase of 75,000 m^3 of industrial waste. Further details would be provided for the second phase should it be required.

Interested Party:	**CIRNAC**	**Rec No.:**	**CIRNAC-IR-37**
Re:	**Water from Proximal Sources**		

Request Made by Interested Party:

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.

Agnico Eagle's Response to Request (June 18, 2026):

The information provided below is to provide additional context on a historical approved scope item. The details are provided for the readers information and is not part of application scope.

As mentioned previously, the use of proximal sources for water use was added to the 2AM-DOH Licence during the 2018 Water Licence Amendment. It is not a new scope within the current application. As per the 2018 Water Licence Amendment, a request was made under Part E to include a volume for winter ice road or winter track construction. The history is outlined in 2018 Water Licence Amendment Hearing Transcripts. As was communicated and approved in 2018, Agnico Eagle will continue to follow the same use.

> *"So, commonly, what TMAC has been doing under our exploration licences is we build tracks over top of lakes that don't actually require necessarily water use or ice, and similarly over the tundra, it's often adequate to just compact the snow, and we call that a track. But in some cases, yes, we would need to use water for -- to create ice for the road. So we've used the language of an "ice road", but in reality, it may require -- it may not require water use."* (Volume 2, Hearing Transcript, page 213)

> *"So in response to your question, Karén, for the Doris-Madrid Water Licence, we would estimate that, on any given year for the construction of winter ice roads, that 60,000 cubic metres [per year] would be required, mainly driven by construction of the all-weather road, which is captured under the Doris-Madrid licence, and for Boston, the estimated water use would be substantially less, at 20,000 cubic metres of water to be held under the "B" for the construction of winter ice roads."* (Volume 2, Hearing Transcript, page 231-232.)

As outlined above, the main driver behind the request in 2018 Water Licence Amendment was to support the development of the Madrid-Boston all-weather road. To construct infrastructure, winter ice roads or winter tracks will be used to facilitate staging activities during construction. Proximal sources in this case would utilize sources close to the road development. The Madrid-Boston all-weather road is an approved activity.

As mentioned at the June 4, 2026 meeting, Agnico Eagle does develop winter ice road / winter tracks for exploration purposes. As presented in past Annual Reports, Agnico Eagle has drawn from Patch Lake as a "proximal source" over the past years to support exploration around Patch Lake. The numbers were below the total annual Water Licence allowance of 60,000 m^3 (e.g., in 2025 – 14,719 m^3; 2024 – 37,026 m^3; 2023 – 5820 m^3). Because there is currently no approval in the 2AM-DOH1335 Licence to draw from Patch Lake, this is why it is considered proximal source in the past. Following the 2026 Water Licence Amendment, Patch Lake would no longer be considered a proximal source as it has been included within the Application.

Proximal sources would have to be within the project extents of the Licence; and it would be pumped from that source with appropriate screens and respect DFO protocols. For context, the 60,000 m^3/year from proximal sources represents 2% of the total freshwater use requested in the 2026 Water Licence Amendment.

====

Previous Responses to CIRNAC-IR-37

Agnico Eagle's Response to Request (April 9, 2026):

The withdrawal of water from proximal sources is an existing Condition of the Licence (as amended in 2018 Water Licence Amendment 2).

As per the 2AM-DOH1335 Licence (Part E, Item 1):

> *The Licensee shall obtain fresh Water for domestic camp use from Windy Lake designated using the designated fresh Water Intake at Monitoring Program Station ST-7a, with the volume not exceeding forty-three thousand eight hundred (43,800) cubic metres per year. The Licensee shall obtain fresh Water for mining, milling, and associated industrial uses from Doris Lake using the designated fresh Water Intake at Monitoring Program Station ST-7, with the volume not exceeding one million nine hundred thirty thousand (1,930,000) cubic metres per year. Drill Water may also be obtained from locations proximal to the drilling targets.* ***Water for winter ice road construction may be obtained from proximal sources and shall not exceed sixty thousand (60,000) cubic metres per year.*** *The total volume of Water use from all sources and for all purposes shall not exceed two million thirty-three thousand eight hundred (2,033,800) cubic metres per year.*

Sources would have to be within the project extents listed in Part A, Item 1 of the Licence. Agnico Eagle reports with withdrawal use through its Annual Report.

Agnico Eagle's Response to Request (April 24, 2026):

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.