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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

November 19, 2025

Jennifer Range
Regulatory Specialist
Agnico Eagle Mines Limited
11600 rue Louis-Bisson
Mirabel, QC
J7N 1G9

Email: jennifer.range@agnicoeagle.com

**Licence No: 2AM-DOH1335
2AM-BOS1835
2BB-BOS1727
2BB-MAE1727
2BE-HOP2232**

RE: NWB Technical Review of the 2024 Annual Report for Hope Bay Project Licences 2AM-DOH1335, 2AM-BOS1835, 2BB-BOS1727, 2BB-MAE1727, and 2BE-HOP2232.

Ms. Range,

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2024 Annual Report (Report), for the Water Licences 2AM-DOH1335, 2AM-BOS1835, 2BB-BOS1727, 2BB-MAE1727, and 2BE-HOP2232, issued for the operation of the Doris – Madrid and Boston Projects and associated exploration projects known generally as Hope Bay Project. The Annual Report and the Annual Geotechnical Inspection report was received from Agnico Eagle Mines Limited (Agnico Eagle or Licensee) on March 31, 2025.

The NWB distributed the submissions to interested parties on April 4, 2025, for a public review with a deadline of July 4, 2025. On May 29, 2025 Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) requested an extension to submit review comments by August 1, 2025.

By August 1, 2025, the NWB received comments from the Kitikmeot Inuit Association (KIA), Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), and Fisheries and Oceans Canada (DFO). Agnico Eagle submitted their response to comments on August 25, 2025.

On September 8, 2025, KIA confirmed that their concerns were addressed by Agnico Eagle's responses. CIRNA and ECCC responded that some of their requests were unresolved and submitted follow-up information requests.

The NWB notes that Agnico Eagle also submitted the following updated management plans with the 2024 Annual Report:

- Care and Maintenance Plan (Version 3, March 2025)
- Spill Contingency Plan (Version 18, March 2025)
- Operations, Maintenance and Surveillance Manual: Hope Bay Doris Tailings Impoundment Area (Revision 8, March 2025)

CIRNAC, in their August 1, 2025 submission, has requested the NWB to clarify the following:

R-06 CIRNAC recommends:

- B. Whether the annual report review processes should be used as a venue to review and approve updated management plans.
- C. Establish a standardized format for the documentation and reporting of Management Plan updates/revisions, to be followed by all Licensees.
- D. Recommendation to withhold the approval of Management Plans that lack well-defined and legible documented change records.

In response to CIRNAC R-06, the NWB maintains their position as mentioned in the 2023 Annual Report review letter.

“The NWB suggests that Agnico Eagle submit separately, for approval, the management plans which have significant updates, as per Part B, Item 13 of the Licence. For those plans which do not have any significant updates or revisions, they can be submitted within the next Annual Report. All plans submitted for review will include a version control section, clearly stating the nature of changes in the plan, and identification within the document highlighting where changes have been made.”

The NWB notes that the three management plans submitted with the 2024 Annual Report do include a version control section which states the nature of changes in the plan, and identification within the documents highlighting where changes have been made. The NWB recommends that Agnico Eagle submit these plans, or their latest versions, under a separate cover for review.

Copies of all documents, including Interveners’ comments and responses received during the review can be accessed through the NWB’s Public Registry using the following link:

<https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1335%20AEM/3%20TECH/B%20GENERAL/4%20ANNUAL%20RPT/2024/>

The following table provides a brief summary of the issues identified during the Report review that pertain to the NWB’s mandate, which require follow up. The table provides comments/deadlines for the Licensee to provide information. For the Interveners’ discussion of these items, please refer to the comment submissions referenced above. It should be noted that a number of questions/comments from Interveners were addressed during the review process; therefore, these items are not included within the table.

Kitikmeot Inuit Association (KIA)		
KIA-1	KIA recommends that Agnico Eagle include a conventional 2-dimensional map showing the sampling locations and/or the coordinates of all sampling locations in future reports	To be included in future Annual Reports
KIA-4	KIA recommends that Agnico Eagle remove 'No Effect' from lake level elevation table 4-1 of the AEMP, and provide a suitable replacement that indicates no conclusion.	To be included in future Annual Reports

Crown-Indigenous Relations and Northern Affairs (CIRNA)		
R-2	CIRNAC recommends that Agnico Eagle include follow-up spill reports in an appendix to all future Annual Reports. This will allow all parties to verify that appropriate mitigative actions have been implemented.	To be included in all future Annual Reports
R-4	CIRNAC recommends that Agnico Eagle should systematically assess the factors that are contributing to any parameters that are significantly underpredicted and where applicable, also describe how the models will be modified to reduce / eliminate underprediction.	To be included in all future Annual Reports
R-5	CIRNAC recommends that future geotechnical inspection reports include ground level photographs appropriately referenced similar to the level of effort used in the TIA geotechnical inspection report.	To be included in all future Geotechnical Inspection Reports
R-6	<p><i>b) Clarify its position regarding whether annual report review processes should be used as a venue to review and approve updated management plans.</i></p> <p><i>c) Consider establishing a standardized format to be followed by all Licence-holders, including Agnico Eagle, with respect to the documentation and reporting of Management Plan updates/revisions</i></p> <p><i>d) Withhold the approval of Management Plans that lack well-defined and legible documented change records.</i></p>	Response provided by the NWB
R-8	CIRNAC recommends that Agnico Eagle advise when the next Dam Safety Review is scheduled per CDA guidance and, review the dam hazard classification prior to resuming mining operations.	Agnico Eagle to provide a response within the next Annual Report submission.

Environment and Climate Change Canada (ECCC)		
ECCC-1	ECCC recommends that Agnico Eagle provide a discussion on whether the AEMP benchmarks should be updated to reflect the FEQG, including all associated rationale.	Agnico Eagle to provide a response within the next Annual Report submission.

After completing the review of the 2024 Annual Report Submission for Hope Bay Project Licences 2AM-DOH1335, 2AM-BOS1835, 2BB-BOS1727, 2BB-MAE1727, and 2BE-HOP2232, the NWB has determined that the information provided generally addresses the requirements of current Water Licence. Please ensure the comments provided in the table above are addressed by the deadlines specified.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (ext. 33) or ali.shaikh@nwb-oen.ca, at your earliest convenience.

Mohammad Ali Shaikh
Nunavut Water Board,
Technical Advisor

Enclosed: Comments – KIA, CIRNAC, ECCC, DFO

Cc: Distribution List – Doris North