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Kugluktuk	Richard Dwyer
Bathurst Inlet Kingaok	Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, Nunavut X0B 1J0
Bay Chimo Umingmaktok	July 13 th , 2026 Re: Review of AEM's 2025 Annual report for Hope Bay Project. Dear Richard Dwyer, the KIA has reviewed AEM's 2025 Annual Report for the Hope Bay project to the NWB.
Cambridge Bay Ikaluktutiak	1) Compliance Monitoring: The KIA's Framework Agreement (FA) and Inuit Impact and Benefits Agreement (IIBA) with Agnico Eagle Mines Limited. (AEM) the cover terms and conditions of NIRB Project Certificate 009 and the NWB Type A water licenses. The Framework Agreement is a confidential agreement between KIA and AEM that supersedes and replaces all previous contractual arrangements between both parties. Section 3.1 of the FA covers Terms and conditions of land use license and reporting.
Gjoa Haven Okhoktok	Appendix A of Section 3.1 of the Framework Agreement specifies the details of annual reporting by AEM to the KIA, which is summarized as follows: AEM is to provide an annual report to KIA providing details of its operations under any land use License, Advanced Exploration Lease and/or Commercial Lease covering the location and operations area of lands affected, and the nature of facilities and equipment at these sites. In addition, AEM is to provide details of progressive reclamation or closure activities undertaken during the year and details of all permits, licenses, and authorizations from other regulatory bodies or agencies that are required for operations.
Taloyoak	This annual report is to provide information on:
Kugaaruk	• Ground disturbances including land use activities for camps, infrastructure, equipment, winter roads and trails. • Fuel and Chemical storage including Chemicals of Potential Concern inventory (COPC), fuel and chemical usage, and spill records. • Drilling programs, locations, and methods. • Water use and effects on water.



- Wildlife interaction, data logs, and summaries.
- Waste disposal, waste management practices, inventory of waste on site, and inventory of hazardous materials or non-combustible waste removed from site.
- Closure and reclamation progress is associated with waste management, drilling, and ground disturbance along with associated costs.
- General information on annual inspection activities by staff and other agencies and their results, community consultations, future exploration work plans, submissions to NIRB, NWB, or NPC or other regulators related to mining activity, archaeological sites and burial grounds, and any incidents of storage or possession of alcohol and drugs on site.

AEM has provided the KIA with the **Hope Bay Project 2025 Annual Report for KIA Framework Agreement** in accordance with Appendix A to Schedule 3.1 of the Framework Agreement. This report is separate from the **Hope Bay Project 2025 Annual Report to the NWB**.

Compliance Status

2) Effects of Monitoring:

a) Whether the conclusions reached by AEM in the Hope Bay 2025 Annual Report to the NWB are Valid.

KIA's consultants in the areas of geotechnical engineering, aquatic sciences, fisheries, hydrology, and wildlife reviewed the Hope Bay 2025 Annual Report to the NWB and the following documents:

- Hope Bay Project 2025 Annual Report to the NWB
- Appendix A. Doris-Madrid Water licenses Concordance
- Appendix B. Boston Water Licenses Concordance
- Appendix C. Site Layouts - 2025
- Appendix D. Water Licence(s) Monitoring Data
 - App D.1: 2AM-DOH1335
 - App D.2: 2BE-HOP2232
 - App D.3: 2BB-MAE1727
 - App D.4: 2BB-BOS1727
- Appendix E. Doris Mine Annual Water and Load Balance Assessment – 2025 Calendar Year
- Appendix F. 2025 Aquatic Effects Monitoring Program – Annual Report
- Appendix G. 2025 Annual Geochemistry Monitoring Report, Doris - Madrid



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- Appendix H. 2025 Waste Rock and Ore Monitoring Report, Boston Camp.
 - Appendix I. 2025 Follow Up Spill Reports
 - Appendix J. Geotechnical Annual Inspections
 - App J.1: Site Wide - 2025 Geotechnical Annual Inspection
 - App J.2: Doris TIA – 2025 Geotechnical Annual Inspection
 - App J.3: 2025 TIA Annual Geotechnical Inspection
- Recommendations Implementation Plan

Overall, our consultants find that many of AEM's conclusions in the 2025 Annual Report are valid although clarification is required in some areas.

The comments on hydrogeology were for the 2025 Hope Bay Annual Report to NIRB. The KIA did not include these in our response to NIRB and include them here for the proponent's response since they pertain to water management.

- b) **Any areas of significance requiring further supporting information or changes to the monitoring program, which may be required.**

Hope Bay Project 2025 Annual Report to NWB

KIA-NWB-01

Review Comment Number	KIA-NWB-01
Subject/Topic	Clarity of water quality monitoring results
References	2025 Annual Report, Appendix D • Whole appendix
Summary	The Appendix and the main report lack a discussion of water quality results and when/if exceedances of water quality standards occurred.
Detailed Review Comment	Throughout Appendix D, water quality monitoring program results are provided in tables. However, some of the tables provide no indication of what standards the results are being compared against and there is no indication if there were any exceedances of water quality standards in some tables (noted in footnote or caption). The caption or footnote for water quality results tables (Tables D1-2, D1-3, D1-4, D1-8, D1-9, D1-10, D1-11, D1-16, D1-24, D1-25, D1-26, D1-27, D1-28, D1-29, D1-30, D2-2, D2-3) should include an indication of how exceedances are noted (e.g., bold text) and a column should be included in each table for the maximum guideline that the result is being compared to. For instance, Table D4-2 provides the guidelines



	that must be maintained as part of the water license for comparison. This should occur in each of the water quality tables presented in the appendix for reference, even if there is no exceedance. There is no text in the appendix or in the main body of the report that describes exceedances or lack thereof. There should be a summary of the adherence to water quality guidelines both in the text of the Appendix for each section and in the main report for clarity. For instance, Table D1-5 indicates an exceedance for oil and grease for ST-6A but no text is provided on what caused the exceedance or actions completed to mitigate the issue.
Recommendation/Request	The KIA requests the following: • Provide a column in each of the water quality results tables in Appendix D (specific tables noted above) that shows the thresholds against which each parameter is being measured (both according to guidelines or site-specific water quality guidelines, where relevant). Note exceedances with bold text and indicate this in the table caption or footnote. • Provide a summary of the water quality results in each section of Appendix D and in the main report to indicate any exceedances of water quality guidelines or the lack thereof such that this information is easily accessible to the reviewer. • Where exceedances occur, provide text to explain the potential cause of the exceedance and what actions were taken to correct the issue.
Importance	Moderate

KIA-NWB-02

Review Comment Number	KIA-NWB-02
Subject/Topic	Blank cells Table D1-20
References	Appendix D, Table D1-20, P. D-25 – D-28
Summary	Provide explanation in footnote and text for cells that are blank in Table D1-20 (e.g., no sample taken, value was zero etc.)
Detailed Review Comment	Various cells in Table D1-20 are blank. Please provide an explanation in the footnote table and in the associated text for the reason for blank cells (e.g., no sample was taken on this date, value was a zero, there was an issue with the sample etc.). Also, all cells for dissolved oxygen and biochemical oxygen demand on page D-28 are empty. Explain why these parameters were not measured,
Recommendation/Request	The KIA requests the following:



	Provide an explanation for blank cells in Table D1-20, including for parameters listed where no values are provided.
Importance	High

KIA-NWB-03

Review Comment Number	KIA-NWB-03
Subject/Topic	Typo in text of Appendix D
References	Appendix D, Section D.2 (Summary of Monitoring Information), P. D-48
Summary	There is a typo in the table number of Appendix D, Section D.2 on page D-48.
Detailed Review Comment	The last paragraph of the Section titled Summary of Monitoring Information on page D-48 says, "Results are presented in Table D2-22 to Table D2-3". This should read "Results are presented in Table D2-2 to Table D2-3".
Recommendation/Request	The KIA requests the following: Correct the typo in the last paragraph of Summary of Monitoring Information on page D-48 (change table D2-22 to Table D2-2)
Importance	Low

KIA-NWB-04

Review Comment Number	KIA-NWB-04
Subject/Topic	Detail needed on arsenic exceedance at site BOS-5
References	Appendix D Section D.4 Tabular Summary of Monitoring Information
Summary	Provide details on arsenic exceedance and what mitigative actions were taken and correct the typo in the reference to Table D4-4.
Detailed Review Comment	Please provide more detail on why/how water quality results for BOS-5 did not meet the criteria for the water license. What actions were taken to mitigate this non-compliance? What was done with the water that had an exceedance of arsenic? There is also a typo in this paragraph. Table D4-3 is listed twice; the references should be Table D4-3 and Table D4-4.
Recommendation/	The KIA requests the following:



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Request	• Provide more detail on the arsenic exceedance at BOS-5 and what actions were taken as a result of the exceedance. • Correct the typo of table D4-4.
Importance	High

KIA-NWB-05

Review Comment Number	KIA-NWB-05
Subject/Topic	Stack concentrations of dioxins and furans
References	2025 Hope Bay Annual Report • Section 5.1.1.1, page 5-2
Summary	Additional information is required on the sources of elevated dioxins and furans in stack emissions, and on how composting will mitigate these exceedances.
Detailed Review Comment	The 2025 stack testing results note concentrations of dioxins and furans above the stack limit for at least the third year (2022 and 2019 levels were also noted well above the limit in the report). No detail is provided on what materials are being incinerated that result in the release of these substances. The report states that “moving forward, Agnico Eagle will be able to address any exceedances of emissions through the use of the composter”. No detail is provided about the timeline of when the composter will be used to address exceedances or how the use of the composter will address exceedances. Is it just that incineration will be used less due to composting? By how much? Will the substances that are resulting in elevated dioxins and furans be composted instead of incinerated? More detail should be provided.
Recommendation/Request	The KIA requests the following: • Please provide information on the materials being incinerated that result in elevated concentrations of dioxins and furans and clarify whether these materials will instead go to composting. • Please commit to reducing the exceedance for dioxins and furans in incineration for 2026 by increasing composting and provide details on how the use of composting will reduce this exceedance (e.g., composting X kg of waste will reduce emissions by X %).
Importance	High



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KIA-NWB-06

Review Comment Number	KIA-NWB-06
Subject/Topic	Missing Follow-up Spill Reports
References	Appendix I • Whole document 2025 Hope Bay Annual Report • Section 9 (Spill Reports), P. 9-1 – 9-7
Summary	Follow-up spill reports are absent from Appendix I and could not be located on the NWB website.
Detailed Review Comment	For the eighteen spills that met the reporting threshold established under the Nunavut Spill Contingency Planning and Reporting Regulations, a detailed follow-up report was to be submitted within 30 days of each incident. These reports were expected to include a description of the event, its immediate cause, and any corrective and preventive actions taken. Appendix I contains only one follow-up spill report, pertaining to a 300 L drill cuttings spill that occurred on February 4, 2025. The remaining 17 follow-up reports are not included in the appendix and could not be located on the NWB website.
Recommendation/Request	The KIA requests the following: • Please provide the follow-up reports for the seventeen reportable spills that are not included in Appendix I or identify where these reports may be accessed. • Given the confusion regarding incident dates identified in the follow-up spill report, it is recommended that future spill reports include date and time-stamped photographs documenting both the spill event and post-cleanup. This would improve recordkeeping and support verification of incident timelines.
Importance	Moderate

KIA-NWB-07

Review Comment Number	KIA-NWB-07
Subject/Topic	Use of professional judgment
References	2025 Aquatic Effects Monitoring Program – Annual Report. p. 28 & 29, 32.
Summary	Using professional judgment rather than statistical analysis to assess



	the potential cause of an effect.
Detailed Review Comment	The report states that “<i>statistical assessments, graphical assessments and professional judgment were used in the evaluation of effects to assess whether an effect occurred and if action level conditions would be triggered by the Response Framework.</i>” If an effect was detected based on statistical and graphical assessments, professional judgment was used to interpret supporting data to assess the potential cause. Factors that are unrelated to Mine activities could influence the detection of a temporal change. Local differences in meteorological conditions, runoff or other naturally variable inputs could also influence changes over time. The report implies that these factors are assessed using professional judgment; however, there could be a tendency to explain away an effect based on professional judgment or to explain the effect incorrectly. The report goes on to reference the Response Framework, which outlines the steps to determine if an effect is Mine-related; however, no mention is made of whether or how professional judgment is used with this tool.
Recommendation/ Request	The report should explain how professional judgment is being used and provide rationale for why this is an acceptable and scientific approach. If this approach is not being used per the Response Framework, an explanation should be provided for why professional judgment is mentioned as a tool.
Importance	Moderate

KIA-NWB-08

Review Comment Number	KIA-NWB-08
Subject/Topic	Benthic invertebrate analysis
References	2025 Aquatic Effects Monitoring Program – Annual Report. p. 34
Summary	No mention is made of taxa richness or Simpson’s evenness index, which assesses the species diversity and quality. An increase in density was seen as a positive effect, but this may not be true if the taxa have shifted to a profile of tolerant species.
Detailed Review Comment	The AEMP assesses the benthic invertebrate community as it relates to density, family richness, family evenness (relative abundance) and the Bray-Curtis Index, which compares similarities between two communities. No significant differences were observed over time or when compared to the reference lake.



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	Family evenness and family richness provide a degree of information as it relates to the health of the benthic invertebrate community; however, calculation of EPT index (Ephemeroptera, Plecoptera, Trichoptera), Hilsenhoff and Shannon Diversity Index provide an indicator of the overall health of the benthic community and subsequently the sampled waterbody. In particular, the Shannon Diversity Index quantifies species diversity by combining species richness and evenness into a single numerical value. These indices have not been calculated as part of the benthic invertebrate sampling program; therefore, the health of the community cannot be determined. Also, an increase in density may be a negative impact if it is comprised of pollution tolerant species.
Recommendation/ Request	Consideration should be given to calculating these indices to identify the overall health of the benthic invertebrate community and associated lake. At the very least, calculation of the Shannon Diversity Index should be completed.
Importance	Moderate

KIA-NWB-09

Review Comment Number	KIA-NWB-09
Subject/Topic	Incinerator waste
References	Main Document – Section 5.1.1.1 2025 Stack Testing Results
Summary	It is not clear how the composter will be used to deal with incinerator emission exceedances.
Detailed Review Comment	Agnico Eagle states that <i>“Moving forward, Agnico Eagle will be able to address any exceedances of emissions through the use of the composter”</i> (p. 38 of 91). It is not clear how composting will be used to address incinerator emission exceedances. If composting will be used to divert waste from the incinerator this should be clarified. Alternatively, if incinerator ash will be composted this needs to be justified. Incinerator emission testing has recorded dioxins, furans, and mercury in incinerator ash generated on site, including average stack concentrations of dioxins and furans above the CWS/Nunavut stack limit in 2025. It is not clear how incinerator ash, which is generally considered hazardous waste, can be handled through composting since the hazardous elements and compounds will not break down.
Recommendation/	Agnico Eagle should clarify what role composting will play in reducing



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Request	incinerator emission exceedances (i.e., through waste diversion from the incinerator or through composting of incinerator ash).
Importance	Moderate

KIA-NWB-10

Review Comment Number	KIA-NWB-10
Subject/Topic	Spill clean up
References	Main Document – Section 9 Spill Reports, Table 9-1
Summary	Several of the spill reports are missing details on how the spills were cleaned up.
Detailed Review Comment	Several of the spill reports are missing details on how the spills were cleaned up (i.e., March 30, 2025 spill, Intelex Number 9987; April 3, 2025 spill, Intelex Number 10010; April 5, 2025 spill, Intelex Number 10019; December 4, 2025 spill, Intelex Number 10653).
Recommendation/Request	Agnico Eagle should provide details on what methods were used to clean up each reported spill in Table 9-1, including specific steps taken (e.g. “as per the Hope Bay Spill Contingency Plan” is not sufficient information).
Importance	Moderate

KIA-NWB-11

Review Comment Number	KIA-NWB-11
Subject/Topic	Update on diesel spill response
References	Main Document – Section 9 Spill Reports, Table 9-1
Summary	Information is missing on whether the spill footprint, including initially inaccessible areas, was fully identified, contained, and cleaned up.
Detailed Review Comment	Agnico Eagle reports that on April 18, 2025 there was a spill of 4000 L of diesel fuel from generator fuel lines which occurred under the snow. Excavation of contaminated crushed rock <i>occurred “focused on the expected primary path of the spill and delineated the spill to the extent possible around existing infrastructure, though some potentially contaminated areas were not accessible...Agnico Eagle plans to remove further material from the initial spill location which was under the generators and is completing trenches around the site to delineate spill footprint”</i> .



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	It is not clear if the entire spill footprint, including initially inaccessible areas, was successfully identified, contained, and cleaned up.
Recommendation/ Request	Agnico Eagle should provide an update on follow-up delineation and clean up of the entire spill footprint to demonstrate that all contaminated areas were appropriately identified, contained and cleaned up.
Importance	Moderate

KIA-NWB-12

Review Comment Number	KIA-NWB-12
Subject/Topic	Climate Change Update and Long-Term Water Management
References	2025 NWB Annual Report – Section 4: Water Management; Appendix E: 2025 Water and Load Balance Assessment – Sections 3.4, 3.5 and 6.0.
Summary	The 2025 Water and Load Balance Assessment incorporates updated climate and hydrologic inputs based on the IPCC Sixth Assessment Report (AR6), including revised precipitation, runoff, evaporation and climate change projections. To assist with interpretation of the assessment results, the report would benefit from a summary as to whether these updated assumptions result in changes to long-term water management requirements, operational planning or closure planning considerations.
Detailed Review Comment	The updated climate datasets improve the predictive basis of the Water and Load Balance Model and represent an important update to previous model versions. However, while the report documents the revised climate inputs, it provides limited discussion regarding whether these changes influence predicted storage requirements, discharge volumes, water treatment requirements, or long-term water management strategies during Care and Maintenance and future operations.
Recommendation/ Request	Summarize how the updated climate projections influence long-term water management predictions and identify whether revised climate assumptions result in changes to projected storage requirements, discharge volumes, operational planning, or adaptive management strategies. Where model results differ from previous assessments, the report should clearly identify the changes, quantify their magnitude where possible, and discuss the implications for future operations, risk management, infrastructure capacity, and long-term site planning. Even if the updated climate projections do not materially alter previous conclusions, explicitly stating this would provide confidence that the potential impacts of climate change have been evaluated and



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	appropriately incorporated into water management decision-making.
Importance	Moderate

KIA-NWB-13

Review Comment Number	KIA-NWB-13
Subject/Topic	Future Predicted Cyanide Concentrations and Adaptive Management
References	Appendix E: 2025 Water and Load Balance Assessment – Sections 5.2.2 and 5.2.3
Summary	The Water and Load Balance Assessment predicts that total cyanide concentrations may exceed MDMER discharge criteria beginning in 2027 under the current mine plan. Limited information is provided regarding the proposed adaptive management response should monitoring confirm this prediction.
Detailed Review Comment	Although measured water quality remained compliant with applicable discharge criteria throughout 2025, predictive modelling indicates that total cyanide concentrations may exceed MDMER limits in future years under the current mine plan. The report indicates that this prediction is based on conservative modelling assumptions and that ongoing monitoring will continue; however, monitoring triggers, contingency planning, treatment options, and decision-making criteria are not discussed in detail. Given the potential regulatory and environmental implications of future cyanide exceedances, the report would benefit from additional discussion of the proposed adaptive management approach. This should include the identification of monitoring triggers and action thresholds, contingency measures, potential treatment or source-control options, and the decision-making criteria that would be used to initiate management responses. Clarification regarding the timing of interventions, evaluation of mitigation effectiveness, and procedures for maintaining regulatory compliance would also improve transparency.
Recommendation/Request	Provide additional information regarding the predicted future cyanide exceedance, including confidence in the prediction, monitoring triggers, planned mitigation measures, treatment options, and the adaptive management framework that would be implemented should monitoring indicate increasing cyanide concentrations.
Importance	Moderate



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KIA-NWB-14

Review Comment Number	KIA-NWB-14
Subject/Topic	Under-Ice Water Level Monitoring and Hydrologic Dataset Completeness
References	2025 NWB Annual Report – Section 6: Aquatic Effects Monitoring Program; Appendix F: 2025 AEMP Annual Report – Sections 2.1, 3.1 and 4.0; 2024 H&H Review Comment KIA-NIRB-04
Summary	Under-ice water level and ice thickness measurements were not completed for Glenn, Imniagut, PO, Ogama and Little Roberts lakes during the 2025 monitoring program due to weather and safety concerns. Similar monitoring limitations occurred during 2024, resulting in two consecutive years of incomplete winter hydrologic datasets.
Detailed Review Comment	The 2024 H&H review requested that under-ice water levels be collected to confirm conclusions regarding the absence of mine-related effects on lake hydrology and fish habitat. While no mine-related effects were identified for the lakes that could be evaluated during 2025, repeated loss of winter monitoring data limits confirmation of seasonal lake water balances, hydraulic connectivity, and long-term verification of hydrologic predictions across the monitoring network. As discussed in KIA-NWB-HB-F&FH-01 in greater detail, the limited water levels and ice thickness measurements in consecutive monitoring years represents a significant gap in data collection under the AEMP.
Recommendation/Request	Develop contingency measures to improve collection of under-ice monitoring data where weather, equipment, or safety constraints limit the planned monitoring program. Where complete winter datasets cannot be obtained, provide additional interpretation using available hydrologic station records, meteorological information, snowpack data, or other supporting datasets to demonstrate that monitoring objectives continue to be achieved.
Importance	Moderate

KIA-NWB-15

Review Comment Number	KIA-NWB-15
Subject/Topic	Long-Term Seepage Trend Interpretation
References	Appendix G: 2025 Geochemical Monitoring Report – Sections 9 and 10



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Summary	The Geochemical Monitoring Report presents annual seepage monitoring results and historical datasets for the Doris and Madrid facilities. Limited discussion is provided regarding long-term trends and whether observed seepage quality continues to support the original geochemical and water management predictions.
Detailed Review Comment	Annual monitoring results are presented clearly and compared with historical observations. However, a concise synthesis describing whether key seepage indicators (e.g., sulphate, conductivity, arsenic, nickel and other mine-related parameters) are stable, improving or increasing over time would strengthen interpretation of the monitoring program and provide additional confirmation that seepage quality remains consistent with long-term predictions.
Recommendation/ Request	Include a summary of long-term seepage trends across the monitoring network and confirm whether observed trends remain consistent with the predicted long-term geochemical performance of the mine facilities.
Importance	Low

KIA-NWB-16

Review Comment Number	KIA-NWB-16
Subject/Topic	Verification of the Conceptual Hydrogeologic Model Through Thermal Monitoring
References	Appendix J.1: 2025 Annual Geotechnical Inspection – Site-Wide; Appendix J.2: 2025 Annual Geotechnical Inspection – Doris Tailings Impoundment Area; Groundwater Management Plan
Summary	Annual geotechnical inspections conclude that frozen containment structures, thermosyphons, and ground temperature monitoring systems continue to perform as designed. Limited discussion is provided regarding how these monitoring results continue to verify the conceptual hydrogeologic model.
Detailed Review Comment	The annual inspections demonstrate that frozen seepage barriers and thermal monitoring systems continue to perform as intended, supporting the integrity of the Project's water management infrastructure. However, limited interpretation is provided describing how the observed thermal conditions continue to confirm expected groundwater flow paths, seepage controls, and the conceptual hydrogeologic model that underpins the Groundwater Management Plan.
Recommendation/	Include a summary describing how annual thermal monitoring results



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Request	continue to support the conceptual hydrogeologic model, including confirmation that groundwater flow paths, seepage controls, and frozen containment systems continue to perform as predicted and that no long-term trends have been identified that would require modifications to the current groundwater management approach.
Importance	Low

KIA-NWB-17

Review Comment Number	KIA-NWB-17
Subject/Topic	Fish and Fish Habitat (water levels and ice thickness)
References	2025 NWB Annual Report - Section 6: Aquatic Effects Monitoring Program Appendix F: 2025 AEMP Annual Report – Section 2.1, Table 2.1-2; 2.2-1; 3.1-1; 4-1
Summary	Water levels and ice thickness measurements (key fish habitat variables) were not collected for Glenn, Imniagut, PO, Ogama, and Little Roberts lakes during the 2025 ice-covered season due to weather-related and safety concerns. Consequently, water-level data from the Doris Lake-2 hydrology station were used to estimate the reduction in under-ice lake surface elevation in Doris Lake in 2025. Similar challenges affected data collection in 2024, when water-level measurements were not obtained due to equipment malfunctions, logistical challenges, and safety concerns regarding ice integrity. As these issues have occurred in consecutive years, they appear to represent an ongoing limitation to winter monitoring efforts.
Detailed Review Comment	No data has been collected for water levels for the past two years of monitoring (2024-2025), and ice thickness data was not collected in 2025 due to weather-related constraints, equipment malfunctions, logistical challenges, and/or safety concerns associated with ice conditions. This represents a significant gap in the assessment of fish habitat conditions under the AEMP. The AEMP identifies only three primary parameters for evaluating winter fish habitat conditions: ice thickness, water level, and stream hydrology. As two of these three parameters were not assessed in 2025, the program's ability to evaluate the extent and availability of under-ice fish habitat was substantially reduced. Furthermore, the lack of water-level data in both 2024 and 2025 limits the ability to assess interannual trends, evaluate potential changes in overwintering habitat availability, and determine whether lake and stream conditions remain within expected ranges. Given the recurring nature of these data gaps over consecutive monitoring years, the reliability and completeness of



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	the fish habitat assessment are increasingly constrained, and the issue may warrant consideration of alternative monitoring approaches or contingency measures to ensure collection of these key habitat variables in future years.
Recommendation/ Request	Consider evaluating whether sampling could be conducted during an alternate period of the ice-covered season if April monitoring is consistently constrained by weather, ice conditions, or safety concerns. As the current AEMP specifies April sampling, the feasibility of collecting comparable data earlier in the winter should be assessed to improve the likelihood of obtaining complete datasets while still meeting monitoring objectives. In addition, alternative methods for collecting key fish habitat data Should be explored to reduce reliance on a single monitoring approach. A formal contingency plan should be developed and incorporated into the AEMP, outlining procedures, backup methods, and decision criteria for data collection when standard monitoring cannot be completed. Given that ice thickness, water level, and stream hydrology are the primary fish habitat indicators monitored under the AEMP, ensuring reliable data collection through contingency measures is critical to maintaining the integrity of the fish habitat assessment and meeting the program's monitoring requirements.
Importance	High

KIA-NWB-18

Review Comment Number	KIA-NWB-18
Subject/Topic	Fish and Fish Habitat (Benthic Invertebrate and Sediment Quality)
References	2025 NWB Annual Report - Section 6: Aquatic Effects Monitoring Program, Appendix F: 2025 AEMP Annual Report Appendix A Data report (2025): A.2; A.3; A.4; Table A.1-2 3.-1
Summary	Discrepancy between 2025 AEMP Annual Report Table 2.1-2 and Appendix A - Table A.1-2 regarding benthic invertebrate and sediment quality sample collection at Windy Lake. Clarification is recommended to ensure the monitoring activities are accurately reported.
Detailed Review Comment	The tables presented in the AEMP are unclear and, in some instances, appear inconsistent regarding which monitoring parameters were assessed at Windy Lake. Specifically, there is uncertainty as to whether benthic invertebrate and sediment quality samples were collected, as different sections of the report appear to indicate different monitoring activities. This lack of clarity makes it difficult to determine the scope of monitoring completed at Windy Lake and to assess whether all planned



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	components of the AEMP were implemented. To improve transparency and interpretability, the report should clearly identify the parameters assessed at each monitoring station and ensure that monitoring summaries, tables, and appendices are consistent throughout the document. Any deviations from the planned monitoring program, including omitted sampling events or changes in sampling design, should be explicitly described and justified. Clarification of the monitoring activities conducted at Windy Lake would help ensure an accurate understanding of the dataset and support the interpretation of monitoring results.
Recommendation/ Request	Revise Table 2.1-2 of the 2025 AEMP Annual Report and Table A.1 2 in Appendix A to ensure consistent and accurate reporting of benthic invertebrate and sediment quality sample collection at Windy Lake. The current discrepancy between these tables creates uncertainty regarding which monitoring components were completed and may lead to confusion during interpretation of the monitoring program and its results. As part of the revision, verify the monitoring records and clearly indicate whether benthic invertebrate and sediment quality sampling was conducted at Windy Lake in 2025. Any deviations from the approved monitoring program or planned sampling schedule should be explicitly documented and explained within the report. Consistency should also be confirmed across all related sections, figures, tables, and appendices to ensure that the reported monitoring activities accurately reflect the work completed. Providing clear and consistent documentation of sampling activities is important for evaluating program implementation, understanding the basis of subsequent analyses, and maintaining confidence in the interpretation of AEMP results. Clarification of the monitoring conducted at Windy Lake will improve the transparency, accuracy, and overall quality of the report.
Importance	Low

KIA-NWB-19

Review Comment Number	KIA-NWB-19
Subject/Topic	Fish and Fish Habitat (Water Quality)
References	Appendix F: 2025 AEMP Annual Report – Section 3.3
Summary	Overall, water quality results indicate that most monitored parameters are within expected ranges and below applicable benchmarks. However, some statistically significant differences were identified relative to site-specific benchmarks and/or between before- and after-



	development periods in several lakes. (Section 3.3). While these trends do not necessarily indicate adverse effects, they should continue to be evaluated to determine whether they reflect natural variability or potential project-related influences and to assess whether any trends emerge over time.
Detailed Review Comment	When the majoring of water quality parameters remained below applicable water quality benchmarks and within expected ranges, several parameters exceeded benchmarks in one or more lakes and/or exhibited increasing trends over time (Table 2.2-2) Although many of these exceedances and trends appear to be localized and of relatively low magnitude, they warrant continued evaluation to determine whether they reflect natural variability or potential project-related influences on aquatic conditions. Specific parameters identified as exceeding site-specific water quality benchmarks in 2025 included turbidity and total phosphorus in Patch Lake, as well as total copper in Doris Lake, although the exceedance for copper was reported to be minimal. Exceedances of benchmark values do not necessarily indicate adverse effects; however, they should be assessed in the context of the magnitude, frequency, and persistence of the exceedance, as well as any associated biological responses. In addition to benchmark exceedances, several parameters demonstrated increasing trends that may warrant further attention and discussion, including: • Total Phosphorus increasing in Doris Lake, • Potential increase in Total Phosphorus in Patch Lake, • Total Aluminum in Patch Lake, • Total Lead in Doris Lake, and, • Total Molybdenum in Doris and Parch Lakes. Although these trends may not currently represent a risk to aquatic life or exceed applicable benchmarks, continued increases could indicate changing water quality conditions over time. As such, it would be beneficial to provide additional discussion regarding the potential causes of these trends, their statistical and ecological significance, and whether they are consistent with natural variability, broader regional patterns, or potential mine-related influences. Continued monitoring and trend analysis will be important for determining whether these observed increases persist and whether additional investigation or management actions may be warranted.
Recommendation/ Request	Please provide additional discussion regarding the increasing trends observed for several water quality parameters, including total phosphorus in Doris Lake, the potential increase in total phosphorus in Patch Lake, total aluminum in Patch Lake, total lead in Doris Lake, and total molybdenum in both Doris and Patch lakes. Specifically, clarify the



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	likely causes of these trends and assess whether they are attributable to natural variability, changes in hydrological or limnological conditions, mine-related activities, or other environmental factors. In addition, consider identifying any existing or proposed mitigation, management, or adaptive monitoring measures that may be implemented to address these increasing trends.
Importance	Low

KIA-NWB-20

Review Comment Number	KIA-NWB-20
Subject/Topic	Fish and Fish Habitat (Water Quality)
References	Appendix F: 2025 AEMP Annual Report – Section 3.3, Section 3.3.1, 3.3.4, 3.3.11, 3.3.24 Section 3.4, Section 3.4.5
Summary	Comparison with Reference Lake B indicates that concentrations of some water quality parameters are elevated in one or more monitored lakes. While these concentrations may remain below applicable benchmarks, the observed differences from reference conditions warrants further evaluation and discussion to determine whether they are attributable to natural variability or potential project-related effects.
Detailed Review Comment	The water quality assessment indicates that concentrations of several parameters, including pH, Chloride, Total Arsenic, Total Uranium were elevated relative to those measured in Reference Lake B. While these observations do not necessarily indicate adverse effects or exceedances of applicable benchmarks, they suggest that water quality conditions in some monitored lakes differ from reference conditions and warrant further evaluation. Additional discussion should be provided to assess the magnitude, consistency, and potential causes of these differences, including whether they reflect natural geochemical variability, watershed-specific characteristics, hydrological conditions, or potential project-related influences. Consideration should also be given to whether these parameters exhibit increasing trends over time and whether the observed concentrations remain within expected ranges based on historical monitoring data. Similarly, sediment quality results indicate that lead concentrations were higher than those measured in Reference Lake B. Although elevated sediment concentrations relative to a reference site do not necessarily indicate ecological risk, they may be indicative of



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	differences in sediment chemistry, depositional processes, or contaminant inputs. Where water or sediment quality parameters are consistently elevated relative to reference conditions, the report should discuss the potential causes and implications of these differences, including whether they are stable, increasing, or attributable to natural background conditions. This additional context would strengthen the assessment of potential project-related effects and improve understanding of how monitored lakes compare to expected reference conditions over time.
Recommendation/ Request	Please provide additional discussion regarding the potential causes and/or significance of these observed differences Between monitored lakes and Reference Lake B. Specifically, water quality results indicate that pH, chloride, total arsenic, and total uranium concentrations were elevated relative to the reference lake, while sediment quality results show higher lead concentrations. Clarification is requested as to whether these differences are attributable to natural background conditions, site-specific geology and geochemistry, hydrological factors, mining-related activities, or other environmental influences. In addition, the ecological and monitoring significance of these observations should be discussed. This should include consideration of the magnitude and persistence of the differences, comparisons to historical baseline conditions and applicable benchmarks or guidelines, and an assessment of whether the observed concentrations represent stable conditions, natural variability, or potential indicators of changing environmental conditions.
Importance	Low

KIA-NWB-21

Review Comment Number	KIA-NWB-21
Subject/Topic	Thermal Performance of North Dam in the Doris TIA
References	Appendix J.2: Doris TIA – 2025 Annual Geotechnical Inspection
Summary	An upstream berm is planned to be constructed for the North Dam and is intended to provide thermal protection for the frozen core and foundation of the dam.
Detailed Review Comment	The North Dam contains a frozen core and foundation (max design temperatures -2°C and -8°C, respectively). Both of the core and foundation of the North Dam experienced warming in 2023 and 2024 in response to elevated water levels in the upstream pond. At one location, the maximum design temperature in the core was temporarily exceeded. In response to this warming, the TIA water level was



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	significantly lowered in 2025 and some thermosyphons in the North Dam were converted to a hybrid active/passive cooling system to provide enhanced ground freezing capabilities. An upstream rockfill berm is also planned to be constructed in 2026 to provide additional thermal protection for the frozen core and foundation once water levels are returned to higher levels during operations.
Recommendation/ Request	Has AEM completed an updated thermal analysis of the North Dam including the proposed berm design that indicate the thermal performance of the dam will meet the design temperature requirements for the core and foundation at higher operational water levels? Has this analysis been calibrated using the thermal monitoring data collected during the observed warming even in 2023 and 2024 and the subsequent thermal response to the lowering of the upstream water level in 2025?
Importance	Moderate

KIA-NWB-22

Review Comment Number	KIA-NWB-22
Subject/Topic	Thermal Monitoring of South Dam
References	Appendix J.2: Doris TIA – 2025 Annual Geotechnical Inspection
Summary	Several thermal monitoring instruments in the South Dam have either failed, are the dataloggers have failed.
Detailed Review Comment	The South Dam contains a frozen foundation (maximum design temperature -2°C) and the dam includes several instruments to monitor its thermal performance. In 2024 and 2025 several of the thermal monitoring instruments failed or the data logger connected to the instruments failed, reducing the monitoring data collected from the dam in limiting AEM's ability to assess the thermal performance of the dam. AEM has noted that an instrumentation specialist will be brought to site in 2026 to try to address the issues with the thermal monitoring instruments.
Recommendation/ Request	Thermal monitoring is critical to monitor the performance of the North and South Dams at the Doris TIA. Both of the dams are considered High Consequence structures (Section 2.5 of the Annual Geotechnical Inspection report). What is AEM's plan to ensure that thermal monitoring capabilities at the Doris TIA are maintained in the future, especially once water levels



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	in the TIA increase during operations. Are there any planned changes to the approach to future instrument installation or datalogger operations that will improve the integrity of the monitoring program going forward?
Importance	Moderate

KIA-NWB-23

Review Comment Number	KIA-NWB-23
Subject/Topic	Interim Dike – Water Elevation Control Channel
References	Appendix J.2: Doris TIA – 2025 Annual Geotechnical Inspection
Summary	A water elevation control channel (WECC) was constructed at the interim dike to provide for water conveyance between the upstream saline storage pond and the main TIA pond during high inflow events. An access road was constructed across the WECC that currently blocks the WECC and inhibits its ability to perform as intended.
Detailed Review Comment	The road that crosses the WECC was intended to include culverts to permit passage of water flow through the WECC. These culverts were never installed. AEM currently manages the water level in the upstream saline storage pond by pumping, when needed. While this may work during normal operations, it is uncertain if AEM has pumping capacity at the interim dike to manage the inflows during the design storm event.
Recommendation/Request	AEM to confirm if the culverts intended to be installed in the road across the WECC will be installed in 2026. If not, AEM to confirm the water management plan and water conveyance capabilities at the interim dike during the design storm event.
Importance	Low

Thank you.

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Cc Cory Barker, Interim Director, KIA, Department of Lands, Environment, and Resources