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Emergency Response Plan

KIA-NWB-1

Review Comment Number	KIA-NWB-1
Subject/Topic	Wildlife Response Teams in Emergency Response Plan
References	Agnico Eagle, Hope Bay Project Emergency Response Plan (Version 5, June 2022)
Summary	Wildlife Response Team (WRT) roles are listed on the Emergency Response Team roster, but some roles are not filled and there is no further discussion about purpose of the WRT within the Emergency Response Plan.
Detailed Review Comment	<p>In Section 3.9 of the Emergency Response Plan (ERP), Agnico Eagle has provided an example Emergency Response Team (ERT) Roster. The bottom of the list includes Wildlife Response Teams (WRTs), comprising WRT Team #1, WRT Team #2, WRT Team Spare, and WRT Lead. In the example image/screenshot, there are two members on each of the two WRT Teams, but no spares and no leads. There is also no further discussion of the WRT within the ERP, and no cross-reference to where further information may be found. For example, the WRT may be described in the Hope Bay Wildlife Mitigation and Monitoring Plan (WMMP); however, this Plan is not currently listed among the documents related to the ERP in Section 1.5, Table 1.1.</p> <p>In addition, as noted in the KIA's review of the 2021 NIRB and NWB Annual Reports, submitted in July 2022, the 2021 Hope Bay Project WMMP was not provided by Agnico Eagle for review. Even if the eventual release of the WMMP provides this missing information, the ERP should include a counter-reference to the relevant WMMP section that contains this missing information of relevance to the ERP.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please provide further information about the roles and responsibilities of the Wildlife Response Team (either within the ERP or an associated document, with reference provided).



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	<ul style="list-style-type: none"> Please explain who would lead the Wildlife Response Team, as there is no WRT Lead person indicated on the roster. Similarly, please explain who would be available as a back-up, as there is no WRT Team Spare indicated.
Importance	Moderate

KIA-NWB-2

Review Comment Number	KIA-NWB-2
Subject/Topic	Roles and responsibilities during emergency response
References	<p>Agnico Eagle, Hope Bay Project Emergency Response Plan (Version 5, June 2022)</p> <ul style="list-style-type: none"> Sections 3.1 through 3.9, 6.2.1
Summary	Agnico Eagle's June 2022 revisions to the Hope Bay Emergency Response Plan have rendered the Plan unclear and confusing. This review comment focuses on Roles and Responsibilities.
Detailed Review Comment	<p>On the ERP Document Control page, Agnico Eagle states that the entire plan was revised <i>"to reflect Hope Bay's 2022 exploration focus and alignment with look and feel of Nunavut division sites."</i> Unfortunately, the amalgamation of TMAC's previous ERP and Agnico Eagle's revisions have made the Plan difficult to follow and have resulted in inconsistencies and errors. Major issues include:</p> <p><u>Roles and Responsibilities</u></p> <p>Section 3 of the ERP is intended to outline <i>"the roles and responsibilities of all parties involved in emergency response planning and implementation at Hope Bay."</i> Section 3.1 states that the Crisis Management Team (CMT) is responsible for directing all work performed and managing all resources during an emergency incident. Section 3.2 then shows the CMT Command Structure; however, this flowchart includes a separate box at the bottom for Crisis Management Team, made up of appointed Scribe, HR, IT, and other staff. It is therefore unclear whether the CMT consists of all roles shown on the flowchart (including Manager on Duty, Crisis Team Coordinator, Incident Commander, ERT Captain, ERT, Emergency Support), or only the box labelled CMT.</p>



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	<p>Subsequent ERP Sections 3.3 through 3.8 outline the roles and responsibilities of the Site Manager, CMT (On Site Management Team), Occupational Health and Safety Committee, All Employees, Supervisor, and Other Personnel. These headings/roles do not match what is shown on the CMT Command Structure; thus, it is still unclear what the CMT members (or higher command) are responsible for. Section 3.9 includes an image/screenshot of ERT Roster contact information for the week of May 25 to June 1, 2022, on page 16 of the ERP. Agnico Eagle states that <i>“an accurate list of available responders will be kept updated as required and communicated to stakeholders”</i>. The example list includes a variety of roles, including ERT members, Captains, Incident Command & Control On Site, Medic On Site, ERT Coordinator, Security, Pandemic Coordinator, and Wildlife Response Teams (WRT discussed in review comment KIA-TC-03). Some of these roles match the CMT Command Structure, but others do not. For example, is the ERT Coordinator equivalent to Crisis Team Coordinator (from flowchart) or is this a different role? Similarly, Table 3.1 on page 17 shows Emergency Response Contact Information for higher-level Project staff. Some personnel are also on the ERT Roster while others are not. Who are the ‘missing’ persons within the context of the CMT or ERT structure? Finally, the KIA notes that all personnel on the ERT Roster May 25 to June 1, 2022, have “D” indicated in the D/N column, which is assumed to be Day/Night. Is there nobody on call to respond to emergencies at night?</p> <p>In addition, Section 6.2.1 states that there is a list of Mine Rescue Trained personnel. This list was not provided in the ERP. If the ERT Roster in Section 3.9 includes Project staff with mine rescue training, these persons should be indicated such that the CMT can quickly identify who is qualified for mine rescue and deploy them as needed.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> Please revise Sections 3.1 through 3.9 of the ERP to ensure that all roles and responsibilities for Crisis Management and Emergency Response are clearly and consistently described.



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	<ul style="list-style-type: none"> • Please clarify whether any staff are assigned the 'night shift' on the weekly ERT roster. If not, please explain how emergency response and crisis management can be implemented in a timely and organized manner during a nighttime emergency. • Please include a list of Mine Rescue Trained personnel in the ERP; if Agnico Eagle instead keeps an internal, updated record available to all staff of Mine Rescue Trained personnel, please indicate this such that there is assurance that mine staff will know who can be contacted if a mine rescue is needed.
Importance	High

KIA-NWB-3

Review Comment Number	KIA-NWB-3
Subject/Topic	Specific procedures removed from Emergency Response Plan
References	<p>Agnico Eagle, Hope Bay Project Emergency Response Plan (Version 5, June 2022)</p> <p>Agnico Eagle, Hope Bay Emergency Response Plan (February 2021)</p>
Summary	Agnico Eagle's June 2022 revisions to the Hope Bay Emergency Response Plan have rendered the Plan unclear and confusing. This review comment focuses on Missing Appendices/Procedures.
Detailed Review Comment	<p>On the ERP Document Control page, Agnico Eagle states that the entire plan was revised <i>"to reflect Hope Bay's 2022 exploration focus and alignment with look and feel of Nunavut division sites."</i> Unfortunately, the amalgamation of TMAC's previous ERP and Agnico Eagle's revisions have made the Plan difficult to follow. Major issues include:</p> <p><u>Missing Appendices/Procedures</u></p> <p>The previous version (Feb 2021) of the Hope Bay ERP had 15 appendices, including detailed Standard Operating Procedures (SOPs) and other pertinent information to allow for effective implementation of the ERP. In the June 2022 ERP, Agnico Eagle has removed all the previous appendices and replaced them with:</p>



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	<ul style="list-style-type: none"> • Appendix A: Medical Evacuation Plan – This is not a plan or a true procedure like the previous Appendix G. It is a “Medevac Check List” that should be supplemental to a plan/procedure. • Appendix B: Agnico Eagle Corporate Emergency Contact List • Appendix C: Exploration Emergency Contacts – This list is essentially duplicated in Section 7.7 (and the latter has an extra contact for Acasta Helicopters). One or the other table should be removed. <p>Although Agnico Eagle has removed the previous appendices themselves, references to the titles and/or appendix letters remain within the ERP pointing to nothing. Examples include:</p> <ul style="list-style-type: none"> • Emergency Notification Process (throughout ERP; previous Appendix A) • Hope Bay ERT Standard and Nunavut/Northwest Territory Mine Rescue Training Standards (Section 3.11, previous Appendix L and M) • IV-0003 Confined Space Entry Work Procedure (Section 6.6.1; previous Appendix J) • III-0009 Severe Weather Conditions Procedure (Section 6.7; previous Appendix K) • Refuge Station Accounting form (Section 6.13; previous Appendix D) • Incident Command Group Duties Underground Emergency/ Check sheet (Section 6.13; previous Appendix I) <p>Conversely, Agnico Eagle seems to have developed new procedures but has not provided these as appendices. Section 6.4 (Pandemic) refers to “Procedure – II-0004 Pandemic H1N1 Influenza”. It is unclear why Agnico Eagle is focusing on H1N1 (“swine flu”) rather than other relevant pandemic diseases such as COVID-19, or emergency response for potential future pandemics in general. Furthermore, in Section 6.15 (Fatality Occurring On Site, Recovery and On-site Morgue), Agnico Eagle refers to a “decontamination section” for decontamination procedures. There is no decontamination section in this ERP or in an</p>
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	<p>attachment/appendix. It is critical that Project staff, especially members of the ERT and CMT, understand where detailed SOPs can be found such that they can respond to emergencies quickly and efficiently.</p> <p>One component from the main body of the Feb 2021 ERP that has been removed from the June 2022 revision is the Incident Rating System (Section 3.1), which was designed to be used as an aid when determining the severity of an incident and to determine whether the event is an emergency requiring activation of the Incident Command Group and ERT/Mine Rescue Team response. This rating system seemed useful for prioritizing resources and clarifying communications protocols for emergency response. The KIA is hopeful that Agnico Eagle will develop a similar system, even though it was not yet presented in the June 2022 ERP; this will be necessary to determine which ERT resources are needed.</p> <p>Appendix B of the previous Hope Bay ERP included Evacuation Routes for various Project facilities, including Doris Camp; Mine Dry, ERT, and Assay Lab Complex; and D-, E-, F-, and G-Wing Camp Facilities. In the June 2022 ERP, however, Agnico Eagle replaced these 9 diagrams with Figures 1 and 2 in Section 6.2 showing “Main Camp & Extension Camp Muster locations” and “Mine Safety Evacuation plan”, respectively. These figures are presented at a poor resolution in the Plan; it is assumed that larger and higher quality figures are posted around the Project site for actual use. However, a map of muster locations for the entire Main/Doris camp does not serve the same purpose or offer the same level of safety as maps of evacuation routes for each facility. It is unclear whether Agnico Eagle has retained the previous evacuation route diagrams for use during emergencies. Note that in Section 7.4, Figure 7.1 shows the Boston Evacuation Plan (fire escape routes). It is difficult to understand why Agnico Eagle has provided an evacuation plan for Boston Camp but has removed those evacuation plans for Doris Camp.</p> <p>Note: the KIA understands that Section 7 is new for the June 2022 version of the ERP and is focused on Exploration and the Boston site. However, it is unclear to the reader that</p>
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	Sections 1-6 may or may not be relevant to the Boston site until they reach Section 7. It would be helpful if Section 1.1 (Purpose and Scope of the ERP) clarifies how the ERP is laid out with respect to each Project site.
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please reinstate missing procedures and Doris camp evacuation routes into the ERP, if Agnico Eagle has retained them. Please also correct the appendix cross-references throughout the ERP. • If SOPs are intentionally kept separate to reduce the bulk of the ERP, please clarify where these documents can be found (for the benefit of Project personnel). • SOPs in previous versions of the ERP have been reviewed during NIRB and/or NWB processes. If Agnico Eagle has or will modify these procedures, please distribute them to the KIA and other parties for review. • Please clarify if an Incident Rating System (or similar) is still being used to prioritize resources for emergency response. If so, please include this rating system in the ERP. If not, please explain how decisions will be made (e.g., when to mobilize CMT, what ERT resources are needed). • Please clarify in the Introduction section of the ERP how the content relates to each Project site (e.g., Doris, Boston).
Importance	High

KIA-NWB-4

Review Comment Number	KIA-NWB-4
Subject/Topic	Ambiguous and contradictory statements in Emergency Response Plan
References	<p>Agnico Eagle, Hope Bay Project Emergency Response Plan (Version 5, June 2022)</p> <p>Agnico Eagle, Hope Bay Emergency Response Plan (February 2021)</p>



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Summary	Agnico Eagle's June 2022 revisions to the Hope Bay Emergency Response Plan have rendered the Plan unclear and confusing. This review comment focuses on Ambiguous Revisions and Language.
Detailed Review Comment	<p>On the ERP Document Control page, Agnico Eagle states that the entire plan was revised <i>"to reflect Hope Bay's 2022 exploration focus and alignment with look and feel of Nunavut division sites."</i> Unfortunately, the amalgamation of TMAC's previous ERP and Agnico Eagle's revisions have made the Plan difficult to follow. Major issues include:</p> <p><u>Ambiguous Revisions and Language</u></p> <p>It is imperative that the ERP is clear enough for Project staff to follow in an emergency. There are some ambiguous or contradictory statements in the June 2022 ERP that require clarification/correction. The KIA is also concerned that Emergency Response Training (Section 3.11) may not have been sufficiently completed given the short turnaround between the March 2022 and June 2022 versions of the ERP, combined with the ambiguous revisions noted below.</p> <p>In Section 3.4, Agnico Eagle states that CMT members will report to the Incident Command Room(s) in the event of an emergency. Incident Command Rooms include the Administration Board Room and the Geohub Board Room. However, Section 3.10 states that crisis management operations will be directed out of the Crisis Management Centre located at the Administration Board Room, but also that the <i>"location will depend on the nature and circumstances of the emergency."</i> Several things are unclear: is the Incident Command Room equivalent to the Crisis Management Centre? Is the Geohub Board Room one of the alternative locations for the Crisis Management Centre? If there are other possible locations, where are they and how would the CMT and other personnel be notified of where to go?</p> <p>The previous Emergency Notification Process (missing from June 2022 ERP, as discussed in review comment KIA-TC-05 above) stated that if an emergency arises, immediately contact the Process Plant Control Room Operator via radio on the emergency channel #1, or by phone at extension 911 or 150 and say, "Emergency, Emergency, Emergency". In the</p>



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	<p>June 2022 ERP, Agnico Eagle refers to a “Code 1 protocol” without providing a cross-reference to where this protocol is located. Presumably, the Code 1 protocol is the information provided at the top of Section 6 – Emergency Measures, which instructs the employee to initiate the emergency by using a two-way radio on Emergency Channel 1 to announce, “Code 1, Code 1, Code 1”. Although the protocol changes may not seem vastly different, it will be important that all Project staff understand that certain communication channels are no longer in use for emergencies and that “Code 1” is just as urgent as “Emergency”.</p> <p>In Section 6.2.1, Agnico Eagle states that when there is an uncontrollable emergency involving fire and smoke underground and personnel cannot reach any of the refuge stations, they should proceed to a dead-end drift, turn off the ventilation fan, and crack open the compressed air line valve. However, in Section 6.13 (Underground Fire), Agnico Eagle states that “Efforts will be undertaken to ensure ventilation to the Mine is maintained. Operation of the Mine ventilation fans will be guarded and monitored to ensure continuous operation of the fans. During a fire in the Mine, there will be no alteration to the operation of the surface fans without the authorization of the Incident Command Group. The effects of the alteration to the mine ventilation fans shall be clearly understood before any changes are made.” It is unclear why there are two sections in the ERP about underground fire/smoke; the most logical reason is that Agnico Eagle kept the previous content (Section 6.13 = Section 5.1 in the Feb 2021 ERP) but then added more, failing to delete irrelevant information. Regardless, there are now contradictory instructions with respect to ventilation fans. Agnico Eagle needs to revisit their added steps in Section 6.2.1, considering the importance of properly functioning ventilation fans (e.g., Section 6.14 is specifically about emergency response for Main/Doris underground ventilation fan failure).</p> <p>Sections 6.2 and 7.4 describe muster/evacuation procedures for the Main/Doris Camp and the Boston Camp, respectively. Other sections of the ERP refer to situations where personnel</p>
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	<p>should assemble at the muster point, including when a fire alarm is sounded (Section 6.2) and for a bomb threat (Section 6.8). During severe weather (Section 6.7), Agnico Eagle uses the term “Assembly Area” for personnel congregation. There is no further description of assembly area in the ERP; thus, it is unclear whether assembly area is the same as muster point, or if it is a different location specifically in response to severe weather.</p> <p>Sections 6.18 and 6.19 outline the protocols for Intruder Response and Active Shooter, respectively. When an unauthorized person or groups enter the Hope Bay facilities, emergency radio channel 1 is used to instruct all employees to stay away from certain areas that will be defined depending on where the intruder is going. However, in an active shooter situation, the public announcement channel is used to accomplish the same goal. It is unclear why different channels are prescribed. Is the public announcement channel more wide-ranging (with respect to distance and audience) or considered a higher priority emergency than the emergency channel?</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please provide assurance that Project staff are or will be trained on the new or different emergency response protocols outlined in the June 2022 ERP. • Please clarify whether Administration Board Room and Geohub Board Room may be used as both the Incident Command Room and Crisis Management Centre. If there are other location options, please include in the ERP or explain how the ERT and CMT will be notified of where to meet. • Please reconcile or provide rationale for the contradictory statements in the ERP regarding ventilation fans when underground smoke/fire is detected. • Please clarify whether assembly area and muster point are used interchangeably in the ERP. If so, please use consistent terminology for clarity. • Please provide further information regarding the use of emergency channel 1 versus the public announcement



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	channel when an intruder or active shooter has entered the Project facilities.
Importance	High

KIA-NWB-5

Review Comment Number	KIA-NWB-5
Subject/Topic	Other missing information in Emergency Response Plan
References	Agnico Eagle, Hope Bay Project Emergency Response Plan (Version 5, June 2022) Agnico Eagle, Hope Bay Emergency Response Plan (February 2021)
Summary	Agnico Eagle's June 2022 revisions to the Hope Bay Emergency Response Plan have rendered the Plan unclear and confusing. This review comment focuses on Other Missing Information.
Detailed Review Comment	<p>On the ERP Document Control page, Agnico Eagle states that the entire plan was revised <i>"to reflect Hope Bay's 2022 exploration focus and alignment with look and feel of Nunavut division sites."</i> Unfortunately, the amalgamation of TMAC's previous ERP and Agnico Eagle's revisions have made the Plan difficult to follow. Major issues include:</p> <p><u>Other Missing Information</u></p> <p>Section 6.10 (Toxic Gas Releases) outlines four actions to take, including immediate evacuation, turning off the gas/ventilating the area, isolating the area, and implementing air quality monitoring. This section does not specify whether the release is aboveground or underground. In the Feb 2021 ERP, Section 3.3.4 (Evacuation) includes the following action for underground emergencies: <i>"when smoke or toxic gases are encountered – do not hesitate – don a personal self-rescue device and proceed to the closest refuge station."</i> Although Agnico Eagle mentions use of self-rescuers for underground smoke/fire in Sections 6.2.1 and 6.13, it would be helpful to also include these instructions for toxic gas releases in Section 6.10.</p>



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	<p>Section 6.11 (Pipeline Breakage) does not have any specific instructions for the ERT. It is unclear who is responsible for undertaking the actions listed. At minimum, this section should include a step to isolate the area and restrict access to ERT personnel only and that mitigation work will be supervised by the CMT (e.g., as is written in subsequent Section 6.12 regarding Dike Failure).</p> <p>Section 6.15 (Emergencies Dealing with Reagents) should include a reference to the Hope Bay Spill Contingency Plan. Currently, Agnico Eagle provides a short list of generic instructions, and refers to the Emergency Response Guidebook. It would be helpful if there was a hyperlink to this guidebook:</p> <p>https://tc.canada.ca/en/dangerous-goods/canutec/2020-emergency-response-guidebook</p> <p>Transport Canada offers the Emergency Response Guidebook in various forms, including printed copy, mobile app, desktop software, web version, and PDF version. Agnico Eagle should ensure that Project staff are familiar with this guidebook (e.g., through Training, Section 3.11) and that copies are readily available on site.</p>
Recommendation/Request	<p>The KIA requests/recommends the following:</p> <ul style="list-style-type: none"> • Please include instructions for personnel to use a self-rescue device in the case of toxic gas releases. • Please clarify the roles and responsibilities of the ERT and CMT (if required) in the case of pipeline breakage. • Please include references to the Spill Contingency Plan throughout the ERP where applicable. Please also provide a link to Transport Canada's Emergency Response Guidebook and ensure that copies are made available to staff and on site.
Importance	Moderate