

Hope Bay

Response to Management Plan Updates for – Care and Maintenance

Submitted to:
Nunavut Water Board

Submitted by:
Agnico Eagle Mines Limited

August 31, 2022

Interested Party:	KIA	Rec No.:	KIA-NWB-1 (Spill)
Re:	Hazardous materials Safety Data Sheets removed		

Request Made by Interested Party:

The KIA requests/recommends the following:

- *Please re-insert up to date SDSs into Appendix 1 of the SCP.*
- *Please explain how Agnico Eagle would demonstrate compliance with WHMIS if the SDSs are not provided.*

Agnico Eagle's Response to Request:

The SDS sheets were mistakenly omitted from the SCP submitted as part of the Care and Maintenance package. They are included in the SCP and will be available again with the submission of the next SCP update as part of the 2022 NWB Annual Report.

Interested Party:	KIA	Rec No.:	KIA-NWB-2 (Spill)
Re:	Outstanding review comments on previous Spill Contingency Plan		

Request Made by Interested Party:

The KIA requests/recommends the following:

- *Please address review comments made on the March 2022 version of the Hope Bay Spill Contingency Plan, submitted by the KIA as part of the 2021 NIRB and NWB Annual Report reviews.*

Agnico Eagle's Response to Request:

Agnico is actively working to address the comments received on the SCP as part of the annual report. The revised SCP will be submitted to the NWB in 2023 as part of the annual report.

Interested Party:	KIA	Rec No.:	KIA-NWB-3 (Spill)
Re:	Stopping flow of a spill		

Request Made by Interested Party:

The list should include a point “(d) Stop flow of spill” and provide examples of how to stop common types of spills (or provide references to where this information can be found).

Agnico Eagle’s Response to Request:

Agnico will revisit the list and add the recommended point in the next revision of the SCP.

Interested Party:	KIA	Rec No.:	KIA-NWB-4 (Spill)
Re:	Communication with external parties (incl. KIA)		

Request Made by Interested Party:

The phrasing in sections 2.3.8 and 2.3.15 should be improved so that it is clear exactly when (i.e., under what conditions) the KIA would be informed of a spill emergency and/or included in discussions about spills below ice of substances that sink.

Agnico Eagle's Response to Request:

Agnico will improve the phrasing in sections 2.3.8 and 2.3.15. This revision will be part of the next submission of the SCP.

Interested Party:	KIA	Rec No.:	KIA-NWB-5 (Spill)
Re:	Containing spills of soluble substances on open water		

Request Made by Interested Party:

In section 2.3.10 it should be made explicit that only certain techniques will be effective to limit the spread of soluble contaminants in open water (as is done for under-ice spills of “substances that dissolve” - in Section 2.3.16). Likewise, for hydrochloric acid (Appendix 1) the containment strategy (surface booms) would not likely be effective due to the substance’s solubility – effective strategies should be included.

Agnico Eagle’s Response to Request:

Agnico will revisit section 2.3.10 as part of the annual report process and consider the comments listed.

Interested Party:	KIA	Rec No.:	KIA-NWB-6 (Spill)
Re:	Internal Reporting of Environmental Incidents – incident consequence levels		

Request Made by Interested Party:

Please clearly state how the Environmental Incident consequence scores are determined.

Agnico Eagle's Response to Request:

Environmental Incident consequence scores are determined using the Agnico Eagle Health, Safety, Environment and Community (HSEC) Risk Analysis, Consequence & Probability Criteria. This matrix is part of the incident entry template documented in Agnico's Incident Management Database System, Intelex. The matrix requires Agnico to rank the spill based on Probability (1-5) and Environmental Consequence (1 – 5). Environment Consequence are subdivided into 3 categories, (1) Ecosystems, (2) Land Use and (3) Water and the rankings are as follows: 1- Negligible, 2- Minor, 3- Moderate, 4- Major and 5 - Extreme/Critical. Probability criteria are ranked as follows: 1- Very Low, 2- Low, 3- Moderate, 4- High and 5 - Very High.

Interested Party:	KIA	Rec No.:	KIA-NWB-7 (Spill)
Re:	Monitoring of spilled substances that sink		

Request Made by Interested Party:

Please state explicitly where/how (e.g., “Samples will be collected and analyzed by a commercial laboratory to characterize...”) samples will be analyzed once collected. Sediment sampling is necessary to quantify substances that sink out of the water column.

Agnico Eagle’s Response to Request:

Samples collection will be decided on a case-by-case basis and will likely include downstream and upstream (of the spill) locations. Agnico agrees that sediment sampling may be necessary for substances that are removed from the water column. This update will be included in the next revision of the SCP.

Interested Party:	KIA	Rec No.:	KIA-NWB-8 (Spill)
Re:	Final clean-up, restoration/mitigation, and continuing monitoring of spilled substances		

Request Made by Interested Party:

Please clarify what would constitute “appropriate” conditions for consultation with the KIA and when continued monitoring would be required – this could be done by providing examples.

Agnico Eagle’s Response to Request:

Agnico agrees with the KIA request and will update the SCP to specify that the KIA be consulted/informed regarding final cleanup, restoration/mitigation, and continuing/on-going monitoring for areas that will not be further amended at project closure. Continued monitoring would be required for spills where the collection of all the spilled material may not be completed and is suspected to have migrated further downstream causing an impact. For example, a spill in a water body or an undetected spill occurring over several days.

Interested Party:	KIA	Rec No.:	KIA-NWB-9 (Spill)
Re:	Continuous monitoring of TSS vs. turbidity in Roberts Bay Discharge System effluent		

Request Made by Interested Party:

Please clarify that the inline instrumentation is actually measuring turbidity and that this parameter is being used as a proxy for total suspended solids (TSS). If turbidity is being used as a proxy, please provide the correlation used to link those measurements to TSS for regulatory purposes.

Agnico Eagle's Response to Request:

The inline measurements are of turbidity (NTU) which are converted to Total Suspended Solids (mg/L) within the meter mechanics after calibration with the appropriate standards. Agnico is committed to complying with MDMER and will not discharge non-compliant water.

Interested Party:	KIA	Rec No.:	KIA-NWB-10 (Spill)
Re:	Text regarding containment of Jet-A		

Request Made by Interested Party:

Please clarify that a first responder should not attempt to contain or remove spills of Jet-A only if the ambient temperature is $\geq 28^{\circ}\text{C}$. Please clarify the ambient temperature thresholds for Jet-A by stating them as absolute values ($< 28^{\circ}\text{C}$, $\geq 28^{\circ}\text{C}$).

Agnico Eagle's Response to Request:

Agnico will make the recommended updates to the text as part of the next revision of the SCP.

Interested Party:	KIA	Rec No.:	KIA-NWB-1 (ERP)
Re:	Wildlife Response Teams in Emergency Response Plan		

Request Made by Interested Party:

The KIA requests/recommends the following:

- *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).*
- *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.*

Agnico Eagle's Response to Request:

- Roles and responsibilities of the Wildlife Response Team (i.e Team Members, Team Leads, Superintendent, Security Office, Exploration Logistics Coordinator, and Helicopter Pilot) are identified in the Wildlife Mitigation and Monitoring Plan rather than in the Emergency Response Plan. Further guidance is provided in SOPs. These are internal documents available for Agnico Eagle staff.
- The roster is listed in the ERP as an example only. The ERT roster is updated weekly by the H&S department and the positions/names are based on who is on site for each week. The Wildlife Response Team is managed by the Environment Department and they maintain the list of trained WRT personnel.
- The WRT Lead is the designated Environmental Dept. employee on-site based on rotation.

Interested Party:	KIA	Rec No.:	KIA-NWB-2 (ERP)
Re:	Roles and responsibilities during emergency response		

Request Made by Interested Party:

The KIA requests/recommends the following:

- *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.*
- *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.*

Agnico Eagle’s Response to Request:

Sections 3.1 through 3.9 were revised as requested.

A note has been made to inform that the ERT Roster does designate what shift (DAY/NIGHT) that Mine Rescue Members are on.

A reference to the Training Matrix with reference to the file location and link.

Interested Party:	KIA	Rec No.:	KIA-NWB-3 (ERP)
Re:	Specific procedures removed from Emergency Response Plan		

Request Made by Interested Party:

The KIA requests/recommends the following:

- *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).*

Agnico Eagle's Response to Request:

- Missing SOP's will no longer be included as appendix documents moving forward. The documents are considered "living documents" and are therefore subject to change. The SOP's are referenced and available at anytime on the public network drive or upon request from department supervisors or the H&S department.

The June 2022 ERP differentiates between mustering and evacuations. The ERP attempts to reduce the number of active muster locations as it was found that accounting for site personnel across numerous muster locations was tedious and inaccurate in practical application.

The total number of muster locations for Doris Camp has been reduced to two and if an evacuation is required the evacuation will take place from Doris main camp hallway and/or Doris extension camp hallway.

This change is in the process of being implemented. Signages has been ordered for the new muster locations, the general site orientation is being updated, along with the evacuation routes.

In the interim, the Doris dorm evacuation routes have been included back into the ERP for reference.

Appendix cross reference completed.

- Clarification has been added to include location of SOP's.
- No revisions have been made to previously referenced SOP's. If and when these SOP's are reviewed and modified in the future copies will be provided to the KIA and all relevant parties as requested.
- This was removed from the 2022 ERP as the Incident Rating System was no longer aligned with the broader AEM-HSH-CS- Corporate Standard for Incident Management and Analysis-V2. This corporate standard has been referenced in the ERP.
- The introduction applies to all Hope Bay sites including Robert's Bay, Doris, Madrid and Boston. This has been clarified in the ERP.

Interested Party:	KIA	Rec No.:	KIA-NWB-4 (ERP)
Re:	Ambiguous and contradictory statements in Emergency Response Plan		

Request Made by Interested Party:

The KIA requests/recommends the following:

- 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 channel when an intruder or active shooter has entered the Project facilities.*

Agnico Eagle's Response to Request:

- Statement outlining ERP training added to section 3.11 Training in ERP.
- The term "Incident Command Room" and "Crisis Management Center" were used interchangeably. "Incident Command Room" has now been removed to avoid confusion.
- A clarifying statement has been added to Section 3.4 Crisis Management Centre.
- Please provide addition information regarding contradiction.
- The term "Muster Point" will be used and all other references have been updated to reflect this.
- Public announcement channel has been changed to emergency channel 1.

Interested Party:	KIA	Rec No.:	KIA-NWB-5 (ERP)
Re:	Other missing information in Emergency Response Plan		

Request Made by Interested Party:

The KIA requests/recommends the following:

- *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.*

Agnico Eagle's Response to Request:

- Section 6.10 does not refer to UG where self rescue devices would be used. The document has been edited to include reference to mine orientation training that includes donning of a self rescue device for underground toxic gas releases. Section 6.2.1 references the use of self rescue device and a reference to mine orientation training has been included in this section also.
- Section 6.11 references the Spill Contingency Plan. Listing ERT / CMT duties is not applicable.
- Updates have been made, and a link has been provided to the TC ERG in section 6.15

Interested Party:	CIRNAC	Rec No.:	CIRNAC-NWB-1
Re:	Spill Contingency Plan		

Request Made by Interested Party:

The Spill Contingency Plan has modules dedicated to Doris, Madrid, Windy and Boston sites. In the Emergency Response Plan, it is unclear if AEM intends to adopt one Emergency Response Plan and Team for all the sites at the Hope Bay project.

CIRNAC would recommend that AEM:

- Clarify if the same Emergency Response Plan/team would be adopted for all the sites: Doris, Madrid, Boston; and*
- If yes, how does AEM intend to coordinate emergency response in these sites with the same team considering their different geographical locations.*

Agnico Eagle's Response to Request:

- This Emergency Response Plan encompasses Doris, Madrid and Boston. Further clarification has been added in the introduction of the revised ERP appended to this response package.
- The plan describes how emergency response is coordinated for the entire (i.e Doris, Madrid and Boston). Doris, Madrid and Boston are not independent operating sites. Additionally, emergency response under Care and Maintenance activities has been consolidated.