

Appendix 3

NIRB and NWB 2024 Annual Report Commitments

Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2025 Annual Report Section
NIRB	Compliance with the Meadowbank Gold Mine Project Certificate No. 004, Amendment 003 – Wildlife and Terrestrial	Term and Condition – 54 (f): Conduct annual aerial waterfowl surveys in the regional study area during construction and for at least the first three (3) years of operation.	<p>Compliance Achievement 2024-2025: In Compliance</p> <p>Comment: Aerial waterbird nest surveys at the Meadowbank site were discontinued due to consistently low nest densities observed from 2005–2012 and no evidence of mine-related effects.</p> <p>At Whale Tail, studies conducted with Trent University and ECCC (2018–2021) assessed flooding impacts and deterrent effectiveness. Results, partially included in the Wildlife Monitoring Summary Report and published online, concluded deterrents were ineffective.</p> <p>In 2024, six long-tailed duck mortalities were reported, exceeding the TEMP threshold. ECCC recommended further mitigation discussions. Agnico Eagle is open to consultation, and NIRB encourages Agnico Eagle to collaborate with ECCC to strengthen mitigation measures.</p>		Agnico Eagle acknowledges this comment and is open to further discussion with ECCC on this topic. Waterbird mortalities are not common at site and Agnico Eagle believes that the current mitigation measures regarding the prevention of waterbird mortalities are effective.	Since Agnico Eagle considers the mitigation measures in place as effective, no discussion took place in 2025. Agnico Eagle is still intending to engage ECCC
NIRB	Compliance with the Meadowbank Gold Mine Project Certificate No. 004, Amendment 003 – Wildlife and Terrestrial	Term and Condition – 58: In consultation with Elders and the HTOs and subject to safety requirements, design the lighting and use of lights at the mine site to minimize the disturbance of lights on sensitive wildlife and birds.	<p>Compliance Achievement 2024-2025: In Compliance</p> <p>Comment: No information was provided in the 2024 Annual Report on lighting impacts or consultations with Elders and HTOs.</p> <p>ECCC and KivIA repeated concerns from 2023. Agnico Eagle repeated general safety-related lighting practices (e.g., downward lighting, motion sensors) but did not explain how these were informed by consultation or monitored.</p> <p>NIRB recommends including consultation details and light impact monitoring in future reports.</p>		<p>As mentioned in previous responses to the KivIA and ECCC, lighting and use of lights are required for human safety. Light mitigation includes directing lighting downward where it does not affect human safety. Agnico Eagle continues to use motion activated light controls at the Mine site so that light is not emitted when rooms are empty of people.</p> <p>On November 12th, 2025, Agnico Eagle tabled this item during a KEAC (Kivalliq Elder's Advisory Committee) meeting and community members did not raise any concerns about lighting issues at the Meadowbank Complex and appreciated Agnico Eagle efforts in ensuring managing this item to their satisfaction. Agnico Eagle feels as though this Term and Condition should be marked as completed.</p>	Section 11.9.2 of the 2025 Meadowbank Complex Annual Report
NIRB	Compliance with the Whale Tail Pit Project Certificate No. 008, Amendment 1 - Birds and Bird Habitat	Term and Condition – 34: Maintain and report annually on the implementation of a Migratory Birds Protection Plan that includes mitigation for Whale Tail South area flooding.	<p>Compliance Achievement 2024-2025: In Compliance</p> <p>Comment: The Migratory Birds Protection Plan has been implemented, and reporting is considered complete. Related studies and the 2024 long-tailed duck mortality events, along with ECCC's comments, are addressed under PC 004 T&C 54(f). NIRB encourages Agnico Eagle to collaborate with ECCC to strengthen mitigation measures.</p>		Agnico Eagle acknowledges this comment and as mentioned in Section 2.1.3, is open to further discussion with ECCC on this topic. Waterbird mortalities are not common at site and Agnico Eagle believes that the current mitigation measures regarding the prevention of waterbird mortalities are effective.	Since Agnico Eagle considers the mitigation measures in place as effective, no discussion took place in 2025. Agnico Eagle is still intending to engage ECCC
NIRB	Compliance with the Whale Tail Pit Project Certificate No. 008, Amendment 1 - Individual and Community Wellness	Term and Condition – 58: Subcommittee for health services in collaboration with GN to reach consensus on health-related programs /services / monitoring / reporting.	<p>Compliance Achievement 2024-2025: Deficient – In Progress</p> <p>Comment: Agnico Eagle continued collaboration with the GN in 2024 to address health-related topics, including STI awareness, patient file sharing, and cultural health outreach. A follow-up meeting planned for August did not occur due to GN absence. Discussions remain ongoing to align site health services with GN priorities.</p> <p>The NIRB looks forward to seeing an update in Agnico Eagle's next annual report.</p>		Agnico Eagle acknowledges the NIRB's comment and will provide an update on continued collaboration with the Government of Nunavut on health-related topics in the next Annual Report. Agnico Eagle remains committed to this collaboration and hopes that the GN continues to support these efforts so that meaningful progress can be made together.	Section 11.11.1.5 of the 2025 Meadowbank Complex Annual Report
NIRB	Compliance with the Whale Tail Pit Project Certificate No. 008, Amendment 1 - Individual and Community Wellness	Term and Condition 60: Coordinate with community health centers to ensure individuals first treated at the mine that require ongoing care are appropriately accommodated.	<p>Compliance Achievement 2024-2025: Deficient – In Progress</p> <p>Comment: Agnico Eagle engaged with GN to improve coordination of care for conditions first treated on-site and requiring follow-up in community health centers. Discussions on secure patient file sharing and clinic coordination are ongoing.</p> <p>The NIRB looks forward to seeing an update in Agnico Eagle's next annual report.</p>		Agnico Eagle acknowledges the NIRB's comment and will provide an update on coordination of care efforts in the next Annual Report. Agnico Eagle remains committed to improving patient follow-up processes and secure file sharing with community health centers. However, full compliance with this requirement depends on continued collaboration from GN and community health centers, and we encourage their ongoing participation in these discussions.	Section 11.11.1.5 of the 2025 Meadowbank Complex Annual Report
GN	Caribou Behaviour Study	<p>Term and Condition: 28 (Project Certificate No. 008, Amendment No. 1)</p> <p>References: Agnico Eagle Mines Limited – Meadowbank Complex. Appendix 39: Meadowbank and Whale Tail 2024 Wildlife Monitoring Summary Report, Part 8 (March 2025a); Agnico Eagle Mines Limited – Meadowbank Complex. Appendix 39: Meadowbank and Whale Tail 2024 Wildlife Monitoring Summary Report, Part 9 (March 2025b)</p>	<p>Identification of issue: Agnico Eagle's Meadowbank and Whale Tail 2024 Monitoring Summary Report (2024 WMSR) presents the Meadowbank Mine 2024 Caribou Behaviour Study.</p> <p>To strengthen the interpretation of the caribou behavioural data, the GN recommends refining the study methods, by collecting more detailed information on the "walking" behavioural category. Additional information in this area will help the Proponent and the GN and other intervenors reviewing future Caribou Behaviour Study reports to determine whether the walking behaviour by caribou reflects a response or non-response to disturbance.</p> <p>Better understanding of caribou behaviour helps the GN understand the potential impacts from the project to caribou, and the effectiveness of mitigation, monitoring and management actions by the Proponent.</p> <p>Importance to review and supporting rationale: As detailed in the 2024 Caribou Behaviour Study, the Project's Terrestrial Advisory Group (TAG) had previously recommended various changes to the Caribou Behaviour Study protocol and analysis methods, including "...testing whether the behaviour "walking" could be considered a response behaviour..." (Agnico Eagle, 2025a, pp. 13– 14). This change was recommended to understand whether and to what extent walking behaviour by caribou was a response to Project-related disturbances.</p> <p>Walking was incorporated as a behaviour category in the 2024 Caribou Behaviour Study and defined as "Walking similar to standing posture but moving at a slow gait (<5 km/h)." (Agnico Eagle, 2025b, p. 41).</p> <p>Concerning walking, the 2024 Caribou Behaviour Study found that: "...disturbances were found to statistically affect the proportion of caribou walking. In both 2023 and 2024 disturbances were found to statistically increase the proportion of caribou walking..." (Agnico Eagle, 2025a, p. 7)</p> <p>And "...[r]oad closure status did not affect response behaviour, though the road being open was positively correlated with walking behaviour..." (Agnico Eagle, 2025a, p. 8)</p> <p>And "...caribou were more likely to be walking on the upstream side of the road. The dominant behaviours on the downstream side were feeding or laying down..." (Agnico Eagle, 2025a, p. 8)</p> <p>These results suggest that walking may be a response behaviour to disturbance.</p> <p>While 2024 Caribou Behaviour Study categorizes walking as a distinct behaviour, it does not clearly distinguish whether it reflects a response to disturbance. To address this, information should be collected and subsequently incorporated into analyses on the direction of travel of caribou. This will help determine whether caribou are walking toward, away from, or parallel to potential disturbances such as roads and vehicles.</p> <p>The GN can use this information to better understand the effectiveness of monitoring, management and mitigation measures undertaken by the Proponent to minimize or avoid impacts to caribou from the Project and its activities.</p>	The GN recommends that the Proponent revise the study design and collect data that classifies walking behaviour as movement toward, away from, or parallel to roads or other disturbance sources.	Agnico Eagle appreciates this comment and agrees that further investigation of walking behaviour as a potential response provides value in terms of understanding caribou response to potential disturbance events. As recommended by the Terrestrial Advisory Group in 2022, data on the predominant direction of travel in relation to roads has been recorded during behaviour surveys. For future behaviour survey reporting, Agnico Eagle will endeavour to further incorporate this information into analyses, particularly to investigate potential links between walking direction of travel and potential disturbance events.	Appendix J - Caribou Behaviour Report of the Wildlife Monitoring Summary Report found in Appendix 36
DFO	Updated DFO Regions & Contacts for Emergency Response	Appendix 25: Meadowbank OPEP and OPPP Version 18	Gap/Issue: The Department of Fisheries and Oceans separated the Central and Arctic Region in April of 2024.	<p>Proponent to update the information in Appendix 25 with new DFO Arctic Region information and contact list for environmental emergency response.</p> <p>•DFO Arctic Environmental Incident Coordinator</p> <p>dfo.arcenvicincident-incidentenvarc.mpo@dfo-mpo.gc.ca</p> <p>E.g., Replacing Figure 1-1 with updated DFO regions. Example figure shown below.</p> <p>DFO to work with the Proponent to ensure all necessary changes and updates are made, and provide a contact list for marine environmental emergencies.</p>	Agnico Eagle acknowledges DFO's recommendation and will consider including an updated figure of DFO regions and contact information in the next version of the Meadowbank OPEP/OPPP. Agnico Eagle looks forward to receiving further information from DFO regarding this recommendation.	Agnico Eagle needs to discuss this recommendation with DFO but is still considering the recommendation for the next update of the OPEP/OPPP

Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2025 Annual Report Section
CIRNAC	Workforce Data	2024 Annual Report, Section 11.10.3.1; Appendix 47. Kivalliq Projects 2024 Socio-Economic Monitoring Program Report, Section 1	<p>In Section 11.10.3.1 of its 2024 Annual Report, Agnico Eagle provides data on the size of its workforce at the Meadowbank and Whale Tail project sites. This data is provided in both headcounts (snapshot of active employees taken at the end of the year, which includes full-time and part-time employees) and Full-Time Equivalents (FTE) (number of full-time positions based on hours worked, where one full-time position is equivalent to 2,184 hours worked). Workforce data is provided for both active Agnico Eagle employees and contractors employed at the project, disaggregated by Inuit identity.</p> <p>Agnico Eagle presents that in 2024, "the respective full-time equivalencies were 929 Agnico Eagle employees in total and 145 FTE of Inuit Agnico Eagle employees." Additionally, it is noted that in 2024, the number of contractors employed at the projects were "727 full-time equivalent contractor positions, and approximately 30 contractor Inuit." Agnico Eagle goes on to report that in total there were "1,831 FTE employees (Agnico Eagle permanent, temporary, on-call, students, and contractors), working full- and part-time jobs, at the end of 2024."</p> <p>The way that the data presented in Section 11.10.3.1 of the 2024 Annual Report by FTE can be a source of confusion. As written, it is not clear if the value of 929 Agnico Eagle employees in total, includes the 145 Inuit Agnico Eagle employees. Similarly, the contractor FTE value could be more clearly presented by distinguishing the number of Inuit and non-Inuit contractors. Section 1 (p. 9) of Agnico Eagle's 2024 Socio-Economic Monitoring Plan Report, presents the same workforce data but in a more succinct and clear manner.</p>	CIRNAC recommends that Agnico Eagle ensure that future Annual Report submissions clearly present the number of Inuit and non-Inuit FTEs for Agnico Eagle employees and contractors.	<p>Agnico Eagle agrees with CIRNAC's recommendation and acknowledges that the workforce data presentation in Section 11.10.3.1 of our 2024 Annual Report could be clearer and may cause confusion regarding the breakdown of Inuit and non-Inuit Full-Time Equivalents (FTEs). Moving forward, Agnico Eagle will ensure that future Annual Report submissions clearly present workforce data with distinct categories showing:</p> <p>-Agnico Eagle Employees: Total FTEs, Inuit FTEs, and Non-Inuit FTEs -Contractors: Total FTEs, Inuit FTEs, and Non-Inuit FTEs</p> <p>Section 1 (page 9) of Appendix 47 - Kivalliq Projects 2024 Socio-Economic Monitoring Program Report, presents this workforce data in a more succinct and clearer format, which we will use as a model for improving the clarity of future Annual Report presentations.</p>	Section 11.10.3.1 of the 2025 Meadowbank Complex Annual Report
CIRNAC	Cultural Awareness Training	NIRB Project Certificate No. 008 Amendment 1, T&C 59; 2024 Annual Report, Section 11.10.3.2.3	<p>T&C 59 of NIRB Project Certificate No. 008, Amendment 1 for the Whale Tail Project states:</p> <p>"The Proponent is encouraged to work with the Kivalliq Inuit Association to establish cross-cultural training initiatives, which promote respect and consideration for the importance of Inuit Qaujijatuqangit to the Inuit identity and to make this training available to Project employees and on-site subcontractors. The Proponent should actively monitor the implementation of these initiatives, including the following items:</p> <ul style="list-style-type: none"> •Descriptions of the goals of each program offered; •Language of instruction; •Schedules and location(s) of when each program was offered; •Uptake by employees and/or family members where relevant, noting Inuit and non-Inuit participation rates; and •Completion rates for enrolled participants, noting Inuit and non-Inuit participation rates." <p>Section 11.10.3.2.3.2 of the submitted 2024 Annual Report provides an overview of activities performed by Agnico Eagle to deliver revamped Cultural Awareness courses. While the information provided is beneficial, details are not provided for the itemized points included in T&C 59 of the Whale Tail Project Certificate. An effort should be made to address these points in future Annual Monitoring Report submissions.</p>	CIRNAC recommends that Agnico Eagle ensure future Annual Monitoring report submissions include details on how it is addressing the specific items identified in T&C 59 of NIRB Project Certificate No. 008, Amendment 2, which concern cross-cultural training initiatives. These are: a) Descriptions of the goals of each program offered; b) Language of instruction; c) Schedules and location(s) of when each program was offered; d) Uptake by employees and/or family members where relevant, noting Inuit and non-Inuit participation rates; and e) Completion rates for enrolled participants, noting Inuit and non-Inuit participation rates.	Agnico Eagle agrees with CIRNAC's recommendation and acknowledges that the Meadowbank Complex 2024 Annual Report, while providing an overview of Cultural Awareness course activities, did not include the specific details required under T&C 59 of NIRB Project Certificate No. 008, Amendment 1 for the Whale Tail Project. Agnico Eagle recognizes the importance of comprehensive reporting on our cross-cultural training initiatives developed in collaboration with the Kivalliq Inuit Association, as these programs are essential for promoting respect and consideration for Inuit Qaujijatuqangit among all project personnel. Moving forward, Agnico Eagle will ensure that future Annual Monitoring Report submissions include detailed reporting on all specific items identified in T&C 59.	Section 11.10.3.1 of the 2025 Meadowbank Complex Annual Report
KivIA	Caribou Observations	Term and Condition: 54d	<p>Terms and Conditions Project Certificate 004 Amendment 3: (d) A detailed analysis of the method of distinguishing between cow/calf groups from other caribou group observations;</p> <p>Compliance with the Project: In Progress</p>	<p>Additional Comments: The 2024 Annual Report (Section 8.18.2) does not mention T&C 54 (d) but it is relevant to distinguish cow/calf groups. Cow/calf groups are not distinguished from other groups in the reporting of for example road surveys, caribou behavior and the remote cameras (Appendix 39; Sections 3.8, and 17). Cow/calf groups are usually more responsive and also are likely to lead migrations.</p> <p>Recommendation: The KivIA requests that Agnico Eagle summarize distinguishing cow/calf groups from other groups for all seasons and to apply it to recording caribou observations.</p>	Agnico Eagle will look into improving observations for distinguishing cow/calf groups from other groups in future caribou observations.	Appendix 36 - Section 3 of the Wildlife Monitoring Summary Report
KivIA	Wildlife Summary Monitoring Report	Term and Condition: 55	<p>Terms and Conditions Project Certificate 004 Amendment 3: Annual Wildlife Summary Monitoring Report</p> <p>Compliance with the Project: Yes</p>	<p>Additional Comments: 2024 is the 19th annual report for the Meadowbank Project.</p> <p>Recommendation: For the 20th Annual Report, the KivIA recommends that it would be useful to summarize how Agnico Eagle and TAG have adapted monitoring to changing knowledge of caribou responses, mine operations and environmental conditions. The summary would be useful for future environmental assessments to minimize "re-inventing the wheel"; it would be useful for considering on-going monitoring programs at other mines and it would be in keeping with Project Certificate 008 T&C 11.</p>	Agnico Eagle is open to looking into ways to summarize how Agnico Eagle and the TAG have adapted monitoring to changing knowledge of caribou responses, mine operations and environmental conditions and would like to discuss this recommendation further with the KivIA.	Appendix 36 - Sections 11 and 18 of the Wildlife Monitoring Summary Report
KivIA	Caribou Migration Corridors	Term and Condition: 56	<p>Terms and Conditions Project Certificate 004 Amendment 3: Maps of caribou migration corridors shall be developed in consultation with Elders and local HTOs, including Chesterfield Inlet and placed in site offices and upgraded as new information on corridors becomes available. Information on caribou migration corridors shall be reported to the GN, KIA and NIRB's Monitoring Officer annually</p> <p>Compliance with the Project: In Progress</p>	<p>Additional Comments: Agnico Eagle (Section 18.8.3) updated information (Appendix 39) notes, "to initiate migratory corridor consultation discussions in 2025."</p> <p>Recommendation: The KivIA requests that Agnico Eagle ensures that draft maps of migration corridors from the collared caribou should be discussed with the Elders especially in the context of changing patterns over time. The Elders' knowledge should be included on the mapped migration corridors.</p>	Discussions with the Kivalliq Elders Advisory Committee are planned in 2025 to discuss typical caribou migration routes and corridors, including a review of recent year collared data. Outcomes of the discussion will be added in the 2025 Wildlife Monitoring Summary Report, included in the 2025 Meadowbank Complex Annual Report.	Section 8.17.3 of the 2025 Meadowbank Complex Annual Report
KivIA	Lighting	Term and Condition: 58	<p>Terms and Conditions Project Certificate 004 Amendment 3: In consultation with Elders and the HTOs and subject to safety requirements, design the lighting and use of lights at the mine site to minimize the disturbance of lights on sensitive wildlife and birds.</p> <p>Compliance with the Project: No</p>	<p>Additional Comments: Agnico Eagle (Section 18.8.3) does not specifically mention whether and how consultations contributed to mitigating impact of lights. Meadowbank and Whale Tail sites are visible from space at night which raises questions about the disturbance of lights.</p> <p>Recommendation: The KivIA requests that Agnico Eagle summarize the discussions with the Elders about lighting to minimize disturbance to sensitive wildlife</p>	As per Agnico Eagle's response to KivIA's comment on the 2023 Annual Report, lighting and use of lights are required for human safety. Light mitigation includes directing lighting downward where it does not affect human safety. Agnico Eagle continues to use motion activated light controls at the Mine site so that light is not emitted when rooms are empty of people. It should be noted that most bird species are present during spring and summer when nighttime is minimized and the need for lighting is less. Monitoring of lighting and light use is not a requirement of T&C 58.	Section 11.9.2 of the 2025 Meadowbank Complex Annual Report
KivIA	Caribou Deterrence at the TSF	Term and Condition: 59	<p>Terms and Conditions Project Certificate 004 Amendment 3: In consultation with Elders and the HTOs, design and implement means of deterring caribou from the tailing ponds, such as temporary ribbon placement or inukshuks, with such designs not to include the use of fencing</p> <p>Compliance with the Project: No</p>	<p>Additional Comments: In 2024, construction activity in the vicinity of the tailings storage was thought to have deterred caribou (Annual Report Section 8.18.11) and there is no mention of ribbons or inukshuks or reference to an earlier report. In 2024, the TAG has been involved with discussions about the roadside flags disturbing migrating caribou which may be relevant to T&C 60.</p> <p>Recommendation: The KivIA requests that Agnico Eagle confirm whether discussions were held about the use of ribbons or inukshuks and whether a summary report is available and whether the ribbons or inukshuks were tested.</p>	Agnico Eagle can confirm that discussions regarding the use of ribbons or inukshuks for caribou deterrence were had in the past, but a summary report is not available. Agnico Eagle would like to work with the KivIA and Baker Lake HTO to ensure compliance with the Term and Condition.	Section 8.17.11 of the 2025 Meadowbank Complex Annual Report
KivIA	Blasting Program	Term and Condition: 85	<p>Terms and Conditions Project Certificate 004 Amendment 3: Develop a detailed blasting program to minimize the effects of blasting on fish and fish habitat, water quality, and wildlife and terrestrial VECs.</p> <p>Compliance with the Project: In Progress</p>	<p>Additional Comments: In 2024, 41 small groups of caribou were recorded during 203 preblast surveys over 176 days at Whale Tail mine (Appendix 39; Section 9.5.2.2; Figure 9.1). Although there were 224 blasts at Whale Tail and IVR pits, the behavior of only three caribou groups was recorded.</p> <p>Recommendation: The KivIA does not agree with Agnico Eagle's recommendation to either conclude that the blasting does not impact caribou or that the threshold for suspending blasting should be reduced from 3 km. Although the opportunities to record the behavioral responses appear to be rare, sample size is inadequate to modify efforts given the strength of Inuit concerns over blasting and caribou.</p>	Agnico Eagle acknowledges this recommendation and will continue with behaviour monitoring during pre-blast surveys in an attempt to collect additional data and increase sample size.	Appendix 36 - Section 9 of the Wildlife Monitoring Summary Report

Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2025 Annual Report Section
KivIA	Impact Predictions	Term and Condition: 11	<p>Terms and Conditions Project Certificate 008 Amendment 1: The Proponent shall maintain the Environmental Impact Statement and the environmental monitoring programs developed for the Project, with predictions updated as new baseline data is collected. If the results of monitoring programs necessitate updates to effects predictions, the Proponent shall update the associated management programs and plans as required to address or reflect the updated assessment of effects.</p> <p>Compliance with the Project: In Progress</p>	<p>Additional Comments: The KivIA appreciates Agnico Eagle's efforts to collaborate with the TAG in 2024 and especially appreciates the detailed minutes and the presentations that are circulated to TAG members. Agnico Eagle summarizes the TAG meetings in 2024 (Section 8.18.12.1) but does not include the presentations or minutes.</p> <p>Recommendation: Agnico Eagle should specify where the complete minutes and presentations are archived and available as part of the public record for Meadowbank and Whale Tail. Project Certificate 008; Section 4.1; No. 12; p. 12/49 states: "The Proponent shall establish a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to regulatory authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project."</p>	<p>Agnico Eagle would like to clarify that sensory disturbance remains an identified primary effect pathway, and results of associated monitoring and management under the Caribou Management Decision Tree have been presented in the Wildlife Monitoring Summary Report since it came into practice in 2019. The line item was only removed from the PEAMP comparison in Table 12-9 in 2024, as further discussed below and to limit redundancy in reporting. Agnico Eagle will clarify this link in subsequent PEAMP reports.</p> <p>More specifically, the intent of the PEAMP evaluation is to compare monitoring results with FEIS impact predictions. In the case of terrestrial wildlife, many impact predictions were qualitative only, so the PEAMP evaluation for terrestrial VCs (Table 12-9) compares monitoring results with TEMP thresholds. These thresholds are established triggers for management action that were originally developed at the project permitting stage, with updates since that time through approved TEMP revisions.</p> <p>Prior to 2019, the TEMP threshold for sensory disturbance to wildlife was "no avoidance of habitat more than 500 m from site, or 1000 m from the AWAR". This is the quantitative threshold at which implementation of supplemental mitigation measures (i.e. measures unspecified in the management plan, but beyond FEIS-assumed mitigation) would have been required to be assessed. A comparison of monitoring results to this TEMP threshold was provided PEAMP reports for each year through 2018.</p> <p>In 2019, the Caribou Management Decision Tree replaced this monitoring threshold, as agreed in consultation with the TAG and an approved revision of the TEMP. Considered an improvement to the original single-value threshold, this decision tree in fact stipulates several layers of site-specific quantitative thresholds (numbers of caribou at various distances from the project, derived through GST calculation) and further, specifies the management action that will be implemented when each threshold is reached. Since the dataset is complex and the response to any given decision-tree threshold exceedance is established, the presentation of monitoring results in comparison to these thresholds has been restricted to the Wildlife Monitoring Summary Report since 2019, since it no longer fits the PEAMP intent.</p> <p>Agnico Eagle will clarify text in the next PEAMP report to better explain this linkage.</p>	Section 12 of the 2025 Meadowbank Complex Annual Report
KivIA	Terrestrial Advisory Group Meeting Minutes	Term and Condition: 27	<p>Terms and Conditions Project Certificate 008 Amendment 1: The Proponent shall participate in a Terrestrial Advisory Group with the Government of Nunavut, the Baker Lake Hunters and Trappers Organization, the Kivalliq Inuit Association, and other parties as appropriate to continually review and refine mitigation and monitoring details within the Terrestrial Ecosystem Management Plan. Additional caribou collar data, results from associated studies, Inuit Qaujimatjuangit shared by knowledge holders, and other monitoring data as available should be considered for incorporation as appropriate. Finalized Terms of Reference for the Terrestrial Advisory Group shall be provided to the NIRB within six (6) months of issuance of the Project Certificate. A summary of outcomes from Terrestrial Advisory Group meetings shall be provided to the NIRB on an annual basis in the Proponent's Annual Report....</p> <p>Compliance with the Project: In Progress</p>	<p>Additional Comments: The KivIA appreciates Agnico Eagle's efforts to collaborate with the TAG in 2024 and especially appreciates the detailed minutes and the presentations that are circulated to TAG members. Agnico Eagle summarizes the TAG meetings in 2024 (Section 8.18.12.1) but does not include the presentations or minutes.</p> <p>Recommendation: Agnico Eagle should specify where the complete minutes and presentations are archived and available as part of the public record for Meadowbank and Whale Tail. Project Certificate 008; Section 4.1; No. 12; p. 12/49 states: "The Proponent shall establish a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to regulatory authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project."</p>	<p>Agnico Eagle acknowledges the KivIA's recommendation. Item 7.1 from the TAG Term of Reference, previously shared with the NIRB, indicates that:</p> <p>7. Minutes of TAG Meetings 7.1. Agnico Eagle will provide a summary of activities and outcomes (of) official minutes of TAG meetings, as agreed to by all the Parties, to NIRB for release on the NIRB public registry.</p> <p>Summaries of activities and outcomes of TAG meetings have been provided to the NIRB, however Agnico Eagle will discuss further with the TAG the best path forward for publicly sharing the minutes.</p>	Discussion ongoing with TAG
KivIA	Caribou Collaring Data	Term and Condition: 29	<p>Terms and Conditions Project Certificate 008 Amendment 1: The Proponent shall, in collaboration with the Government of Nunavut, collect additional caribou collar data and conduct analyses of this data to quantify the zone of influence and associated effects of project components on caribou movement for a study area that includes the Whale Tail mine site, the haul road, the Meadowbank Gold Mine and its All-Weather Access Road. A summary of the analyses and associated effects shall be provided annually in the Proponent's annual report to the Nunavut Impact Review Board.</p> <p>Compliance with the Project: In Progress</p>	<p>Additional Comments: The KivIA appreciates the maps showing seasonal movements by herd (Appendix 39; Section 6.2.1) as a step toward a more detailed analysis of the collared caribou relative quantifying the Zone of Influence and caribou responses to project components. A previous GN-led study of caribou responses to WTHR was published in 2025 but is only for spring migration 2011-2019 and did not include traffic frequency (Boulanger et al. 2025).</p> <p>Recommendation: Agnico Eagle should work with TAG to design an analysis to meet T&C 29.</p>	<p>Agnico Eagle believes that they are in compliance with T&C 29 as a result of previously completed studies. Agnico Eagle will work with the TAG to continue further analyses. Progress and results of any analyses related to this initiative will be provided in annual reports to NIRB.</p>	Appendix 36- Sections 6, 11 and 17.3 of the Wildlife Monitoring Summary Report
KivIA	Traffic Monitoring	Term and Condition: 31	<p>Terms and Conditions Project Certificate 008 Amendment 1: The Proponent shall develop and implement a Road Access Management Plan and maintain traffic monitoring logs along the haul road between the Whale Tail Pit project and the Meadowbank mine. Where traffic exceeds levels predicted within the Environmental Impact Statement, the Proponent shall develop and implement appropriate modifications to its wildlife protection measures. The Road Access Management Plan shall be provided to the Nunavut Impact Review Board (NIRB) 90 days prior to operations commencing. An annual summary of the monthly maximum, minimum and average traffic levels shall be provided to the NIRB in the Proponent's annual report.</p> <p>Compliance with the Project: In Progress</p>	<p>Additional Comments: Traffic frequencies are high when set in the context of caribou responses; for example, in 2024, the WTHR traffic log recorded an annual total of return trips involving 143,764 vehicle passages (2024 Annual Report; Section 11.7.1.2.). T&C 31 requires monthly traffic which is met in the 2024 Annual Report. But the KivIA notes that hourly or daily traffic frequencies are essential to describe the effectiveness of mitigation and caribou responses. In 2024, an objective for the remote camera project included traffic monitoring but no results are reported (Appendix 39; Section 8.2). Instead, at the fall 2024 TAG meeting, Agnico Eagle announced a new study design will be developed to quantify daily traffic rates on the AWAR and WTHR, to estimate duration of convoys, and to examine caribou crossings in relation to vehicle traffic.</p> <p>Recommendation: The KivIA is keenly supportive of a study design to measure responses to convoys, including daily and hourly traffic for implementation in time for 2025 fall migration.</p>	<p>Agnico Eagle is currently exploring a study design to measure responses to convoys. A meeting will be held with the TAG to incorporate comments for implementation in an upcoming migration.</p>	Appendix 36 - Sections 8, 17.2 and Appendix J of the Wildlife Monitoring Summary Report
ECCC	External contact information – incorrect attribution of telephone number	Meadowbank Complex 2024 Annual Report - Appendix 46. Emergency Response Plan (v.20a) - Section 3. Process – External Emergency Contact Information (p. 57)	One of the rows in this table is for "Environment Canada: 24-hour emergency pager monitored by Emergency and Enforcement". One of the listed telephone numbers (867-920-8130) and the fax number (867-873-6924) are for the NT-NU 24-hour Spill Report Line.	ECCC recommends the Proponent verify whether it was intentional to report telephone and fax numbers for the NT-NU 24-Hour Spill Report Line in the row for "Environment Canada: 24-hour emergency pager monitored by Emergency and Enforcement".	Agnico Eagle did not intend to include the telephone and fax numbers for the NT-NU 24-hour Spill Report Line in the row for Environment Canada: 24-hour emergency pager row. Agnico Eagle acknowledges that this was an unintentional addition and will be amended in the next version of the Emergency Response Plan.	Appendix 42 - Emergency Response Plan
ECCC	Leaks and drips from equipment and vehicles	Meadowbank Complex 2024 Annual Report - Appendix 22. Spill Contingency Plan (v.22) - Section 5. Action Plan (p. 26)	Section 5 provides a list of potential spill events that could occur as part of the project. One potential event that was not included is: "Leaks or drips of hazardous substances or fuels due to malfunction of equipment and vehicles". It is noted that spills have occurred at the Project site over the last year due to this scenario taking place.	ECCC recommends the Proponent consider including leaks or drips of hazardous substances or fuels due to malfunction of equipment and vehicles in the list of potential spill events.	Agnico Eagle acknowledges ECCC's recommendation and will update the list in Section 5 of the Spill Contingency Plan to include reference to "Leaks or drips of hazardous substances or fuels due to malfunction of equipment and vehicles" in the next version of the Plan.	Section 5 of the Spill Contingency Plan in Appendix 22
ECCC	Quantity of hazardous substances	Meadowbank Complex 2024 Annual Report - Appendix 22. Spill Contingency Plan (v.22) - Section 6. Hazardous Materials Stored on Site, Table 7. Materials stored at site during operations (pp. 35-36)	Table 7 in the Spill Contingency Plan lists the maximum amount of each hazardous substance per unit (e.g., per sea can, per truck, per bag, etc.); however, it does not list how many units of each substance would likely be stored on site, nor the total quantity of the substance that would be expected by weight or volume. A knowledge of total volume on the site is relevant when preparing for and responding to spills, and it is therefore recommended that this information be provided in an additional column. Furthermore, it is recommended that a column be added to this table listing any mitigation measures that will be used for storage of each hazardous substance (as appropriate) to prevent leaks or spills (e.g., use of secondary containment).	ECCC recommends the Proponent include the following information in the table: •Maximum amount of each substance anticipated to be on-site (by total weight or volume) •Mitigation measures that will be used for each substance to prevent leaks or spills	Agnico Eagle acknowledges ECCC's recommendations and will commit to updating Table 7 to include the maximum amount of each substance anticipated to be on site in the next version of the Spill Contingency Plan. Information regarding hazardous materials and fuel storage locations is well-detailed in the Hazardous Materials Management Plan and a reference to this Plan will be added to Section 6 of the Spill Contingency Plan.	Section 6 of the Spill Contingency Plan in Appendix 22
ECCC	Maps in Contingency Plan	Meadowbank Complex 2024 Annual Report - Appendix 22. Spill Contingency Plan (v.22) - Section 2.1. Prevention and Inspections, Figures 1-5. Site Maps (pp. 5-9)	The Spill Contingency Plan has several site maps indicating fuel storage locations, landfarm locations, etc.; however, the maps do not list the locations of other hazardous substances that are stored on site. Inclusion of these locations on the map is recommended, as the Spill Contingency Plan will be relied on in emergency situations, and a general awareness of all potential sites where spills of hazardous substances could occur (and the types of substances that could spill) can support preparedness and situational awareness during response.	ECCC recommends the Proponent include storage locations for other hazardous substances (in addition to hydrocarbons / fuels) on the site maps within the Spill Contingency Plan.	Agnico Eagle acknowledges ECCC's recommendation and will include storage locations for other hazardous substances on the site maps in the next version of the Spill Contingency Plan.	Figures 1 and 5 of the Spill Contingency Plan in Appendix 22

Authority	Topic	Reference to comments	Regulator's Comment	Regulator's Recommendation	Agnico Eagle's Response to Comments	2025 Annual Report Section
ECCC	General mitigation measures	Meadowbank Complex 2024 Annual Report - Appendix 22. Spill Contingency Plan (v.22) - Section 2.1. Prevention and Inspections (p. 4) - Appendix 43. Hazardous Materials Management Plan (v.8) - Section 2.3. General Hazardous Materials Storage Guidelines (pp. 8-9)	There are several additional mitigation measures / storage best practices that contribute to spill prevention, included within the Hazardous Materials Management Plan (Section 2.3 General Hazardous Materials Storage Guidelines; pp. 8-9). It is recommended that a reference to the Hazardous Materials Management Plan be placed in Section 2.1 of the Spill Contingency Plan to ensure that the full range of mitigation measures and storage practices that will be used are communicated. Additionally, it is recommended that the language on one suggested principle: "Encourage workers to take reasonable measures to prevent spills" be strengthened, as it would be an expectation that workers would take reasonable measures.	ECCC recommends the Proponent: •Add within the Spill Contingency Plan a reference to the Hazardous Materials Management Plan to indicate that additional mitigation measures and storage practices may be found in that document. •Consider changing the language of the bullet: "Encourage workers to take reasonable measures to prevent spills" to strengthen the mitigation measure, e.g., "Require workers to take all reasonable measures to prevent spills"	Agnico Eagle acknowledges ECCC's recommendations and will include both the reference to the Hazardous Materials Management Plan and updated wording in the bullet point indicated to strengthen the mitigation measure in the next version of the Spill Contingency Plan.	Section 2.1 of the Spill Contingency Plan in Appendix 22
ECCC	Vehicle, equipment, and refueling mitigation measures	Meadowbank Complex 2024 Annual Report - Appendix 22. Spill Contingency Plan (v.22) - Section 5. Mitigation of Risks (pdf pp. 188-190) - Appendix 43. Hazardous Materials Management Plan (v.8)	The Spill Contingency Plan contains a section detailing the procedures and safeguards that will be in place for fuel transfer to and from the Baker Lake Oil Handling Facility (Section 5 Mitigation of Risks; pdf pp. 188-190). What is currently not reflected in the Spill Contingency Plan (or the Hazardous Materials Management Plan) is a section on refueling of equipment and vehicles (i.e., focusing on smaller scale refueling procedures located closer to the point of use, rather than bulk fuel transfer). Refueling of vehicles and equipment can present a risk of leaks or spills. Additionally, the use of vehicles and equipment themselves can pose risk of leaks and spills of fuels and hydrocarbons to the environment. Neither the Spill Contingency Plan nor Hazardous Materials Management Plan currently contain information related to mitigation measures for vehicle and equipment leaks and spills. It is recommended that a section be added to the Spill Contingency Plan or Hazardous Materials Management Plan to highlight the best practices and mitigation measures that will be in place related to refueling and use of vehicles and equipment.	ECCC recommends the Proponent include a section on mitigation measures within the Spill Contingency Plan or Hazardous Materials Management Plan related to refueling and use of equipment and vehicles. Measures that form standard best practices in similar projects and could be considered for this section include (but are not limited to): •Use of drip trays or absorbent mats at refueling locations to prevent drips; •Fuel nozzles equipped with automatic shutoffs; •Operators stationed at both ends of hoses during refueling operations, unless both ends of the hose are visible and accessible by one operator; •Fuel remaining in hoses is discharged into equipment or returned to the storage container; •Refuel at least 31 m from the normal high-water mark of any water body; •Provide adequate lighting at refueling areas; •Use of secondary containment for any equipment with a built-in fuel tank; •Regular inspection of vehicles and equipment for drips or leaks, as well as regular maintenance; •Use of biodegradable hydraulic oil (when appropriate) for equipment that is working near or in water; •Park vehicles and equipment over a drip tray or absorbent mat overnight, and at a location that is at least 31 m from the normal high-water mark of any water body.	Agnico Eagle acknowledges ECCC's recommendation would like to mention that both the Spill Contingency Plan and Hazardous Materials Management Plan do contain references to mitigation measures related to the refueling. Table 2: Product Transfer Risk Assessment - refueling station to fuel truck, located in Section 5 of Appendix L of the Spill Contingency Plan contains a column with mitigation measures associated with potential incidents that could occur during refueling. Section 5.3 Fuel Truck Transfer Procedures, located in the Hazardous Materials Management Plan does contain a list of mitigation measures in place prior to fuel transfer. Agnico Eagle agrees that more detail could be added regarding smaller scale refueling procedures and will take ECCC's recommendation into consideration during the next review of the Spill Contingency Plan and Hazardous Materials Management Plan.	For consideration during the next Hazardous Management Plan update
ECCC	Storage of hazardous substances	Meadowbank Complex 2024 Annual Report - Appendix 43. Hazardous Materials Management Plan (v.8) - Section 2.3.2. General Guidelines for Storage Areas (pp. 8-9)	This section contains several guidelines where edits or clarifications are recommended: • For the guideline: "Where necessary secondary containment is installed to allow for the containment of at least 110% of the largest container or tank volume within the contained area", the plan should specify what criteria the Proponent would use to determine when secondary containment is necessary. It is recommended that secondary containment be employed as much as possible for storage of hazardous materials to prevent their release to the environment in the event of a leak or spill. •For the guideline: "Storage areas are located at least 30 metres from surface water and on a low permeability area", it is recommended that this be changed to 31 m to align with the setback distance specified in the annual report. • For the guideline: "Storage areas are adequately signed indicating that hazardous materials/wastes are stored therein", it is recommended that additional information be added to the signs to indicate that smoking should not take place within 15 m of the storage areas. Smoking near these areas poses a risk of igniting flammable vapours. • For the guideline: "Adequate spill and emergency response equipment has been installed at large volume storage areas – i.e., bulk fuel tank facilities (i.e. spill control, fire protection, etc.). A list of spill control equipment is provided in the Spill Contingency Plan", it is recommended that appropriate spill and emergency response equipment (e.g., a spill kit at minimum) be located near all locations where hazardous materials are being used, not exclusively large volume storage areas.	ECCC recommends the Proponent: •Specify when secondary containment would be employed for the storage of hazardous materials (i.e., for what type of materials, or in what situations); •Change the setback distance to water to 31 m to align with that specified in the annual report; •Add additional information to the signs demarcating hazardous materials storage areas to specify no smoking within 15 m of the storage area; •Place appropriate spill response equipment (e.g., a spill kit) at all sites where hazardous materials are stored (i.e., not only at large volume storage areas).	Agnico Eagle appreciates the above recommendations provided by ECCC. Agnico Eagle follows the CCME Code of Practice Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products. Regarding the comment on secondary containment, the guideline requiring tanks, where necessary, to be stored within secondary containments to allow for the containment of at least 110% of the largest container or tank volume within the contained area, is in reference to single-walled fuel tanks. Agnico Eagle agrees to change the setback distance to water to 31 metres within the next update of the Hazardous Materials Management Plan. As indicated in Appendix A of the Spill Contingency Plan, signage specifying no smoking is present and inspected at all fuel farms on a weekly basis. It is Agnico Eagle's policy that smoking is prohibited on site outside of designated smoking areas. Agnico Eagle would like to advise ECCC that spill kits are not only available at large volume storage areas. Spill kits are present at the Hazardous Materials Storage Area and are checked on a weekly basis as part of the Hazardous Material Storage Area Inspection Report (Appendix C of the Hazardous Materials Management Plan). Additionally, as detailed in Section 5.2 of the Hazardous Materials Management Plan, all pick-up trucks are equipped with a spill kit. Agnico Eagle believes that there is adequate spill response equipment available.	For consideration during the next Hazardous Management Plan update
ECCC	Vehicle maintenance and safety	Meadowbank Complex 2024 Annual Report Meadowbank Complex 2022 Annual Report - Appendix 46. Whale Tail Haul Road Management Plan (v.4) - Section 9.1. Accidents and Malfunctions (p. 27)	A list of potential causes for vehicle accidents is listed in this section. One type listed is: "Risk of people getting stuck on the road in bad weather such as in heavy snow or whiteout conditions, or due to mechanical breakdown". Mechanical breakdown could also result in spillage of potentially harmful materials to the environment, either because it caused an accident where a subsequent spill occurred, or the mechanical breakdown itself resulted in the release (e.g., loss of vehicle fluids). In the list of non-reportable spills for 2024, there are instances where mechanical breakdown / failure led to loss of hazardous substances, including hydraulic oil, diesel, coolant, and engine oil to the environment. A potential mitigation measure for this scenario is the regular inspection of vehicles for drips / leaks.	ECCC recommends the Proponent add the possibility for spills or leaks of potentially harmful materials in the event of a vehicle accident caused by a mechanical breakdown.	Agnico Eagle acknowledges ECCC's comment and will take this recommendation into consideration for the next update of the Whale Tail Haul Road Management Plan.	For consideration during the next Whale Tail Haul Road Management Plan update
ECCC	Mortality Threshold for Waterbirds	Meadowbank Complex 2024 Annual Report - Appendix 38. Terrestrial Ecosystem Management Plan (TEMP) (v.9) - Section 3.7.3.3. Project-Related Mortality, Table 17. Monitoring Approach for Waterbirds at the Meadowbank, Whale Tail Mine and Haul Road	The 2024 TEMP reports six long-tailed duck mortalities in 2024. Long-tailed ducks are a waterbird, specifically a species of migratory waterfowl. According to Section 3.7.2.2 of the TEMP, "The threshold level of mortality beyond which further mitigation will be required is one Waterbird per year". Section 3.7.3.3 Project-Related Mortality indicates the Proponent will discuss and implement further mitigation in consultation with ECCC to minimize effects.	ECCC recommends the Proponent consult with ECCC about how further mitigation measures could be implemented at the mine site(s) to help prevent further waterbird mortalities going forward. Updated, clear waterbird mortality mitigation measures should be included in the updated TEMP and be made available for review.	Agnico Eagle acknowledges this recommendation and is open to further discussion with ECCC on this topic. Waterbird mortalities are not common at site and Agnico Eagle believes that the current mitigation measures regarding the prevention of waterbird mortalities are effective.	Since Agnico Eagle considers the mitigation measures in place as effective, no discussion took place in 2025. Agnico Eagle is still intending to engage ECCC
TC	Transportation of Dangerous Goods /Hazardous Materials	2024 Annual Report, Section 6.1.1.3 – Hazardous and non-hazardous waste 2024 Annual Report, Appendix 21 – Meadowbank 2023 Hazardous and Non-Hazardous Waste Transport Manifest	Appendix 21 provides a list/summary of hazardous (dangerous) goods that were shipped from the site. It would assist future reviews of the Annual Report if copies of the dangerous goods shipping documents were included with the annual report rather than simply a summary.	Transport Canada requests that NIRB bring this to AEM's attention.	Agnico Eagle appreciates Transport Canada's recommendation and will take this into consideration for the next annual report.	Agnico Eagle would like to engage with Transport Canada to determine the best approach to share this information