



PROJECT: NWB 2AM-MEL1631; NWB 2BB-MEL-1424;

NIRB Project Certificate No. 6;

DATE: July 12, 2021

SUBJECT: Review of Meliadine 2020 Annual Report

1. Introduction

The Kivalliq Inuit Association (KIA) have conducted a review of the 2020 Annual Report for the Meliadine Gold Project. This document was submitted by Agnico Eagle Mines Ltd. (Agnico Eagle) to address requirements within the following authorizations:

- NWB Type A water license 2AM-MEL1631;
- NWB Type B Water License 2BB-MEL1424;
- NIRB Project Certificate No. 6;
- KIA Permit KVCA07Q08;
- KIA Permit KVCA11Q01;
- KIA Production Lease KVPL11D01; and
- The Meliadine IIBA.

KIA has completed our review with the support of the following consultants:

- Hutchinson Environmental Sciences Ltd. (HESL), aquatic environment specialists, and
- Aurora Wildlife Research (AWR), terrestrial specialists.

Agnico Eagle's report consisted of the 2020 Annual Report itself, and the following 43 appendices:

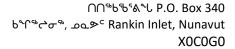
- Appendix 01 2020 Annual Report Appendix Summary
- Appendix 02 2020 Drill Site Locations
- Appendix 03 2021 Mine Plan
- Appendix 04 General Site Print
- Appendix 05 Water Balance and Water Quality Modeling Tabular Data
- Appendix 06 2020 Annual Geotechnical Inspection Report
- Appendix 07 2019 Annual Geotechnical Report Agnico Eagle Responses and Action Table
- Appendix 08 2020 Annual Geotechnical Report Agnico Eagle Responses and Action Table
- Appendix 09 As-Built Drawing of Tiriganiaq 02 Open Pit Access Road
- Appendix 10 2020 Site wide GTC Locations
- Appendix 11 2020 Annual Geochemical Report
- Appendix 12 2020 Results of the Tailings Supernatant Sampling
- Appendix 13 2020 Hazardous Waste Documentation
- Appendix 14 2020 Stack Testing Report
- Appendix 15 2020 Reportable Spills
- Appendix 16 Mock Scenario Spill Report







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- Appendix 17 2020 Aquatic Ecosystem Monitoring Program (AEMP) Report
- Appendix 18 2020 Calibration Data
- Appendix 20 2020 Water Quality Management and Optimization Plan Tabular Results
- Appendix 21 DDH Samples
- Appendix 22 2020 Blast Monitoring Memorandum
- Appendix 23 2020 Noise Monitoring Report
- Appendix 24 2020 Air Quality Monitoring Report
- Appendix 25 2020 Toolbox Presentations
- Appendix 26 2020 Terrestrial Environment Management and Monitoring Plan Report
- Appendix 27 2020 Caribou Trail Camera Study
- Appendix 28 2020 Dust and Vegetation Study
- Appendix 29 2020 Caribou Behaviour Study
- Appendix 30 2020 Wildlife Observations
- Appendix 31 2020 Marine Mammal and Seabird Report
- Appendix 32 2020 Tundra Restoration and Natural Recovery Monitoring Report
- Appendix 33 Management Plans
 - Mine Waste Plan
 - o Ore Storage Plan
 - o Explosives Management Plan
 - o Blast Monitoring Program
 - o Ammonia Management Plan
 - Sediment and Erosion Management Plan
- Appendix 34 2020 AWAR Usage
- Appendix 35 Post-Oil Transfer Reports
- Appendix 36 2020 Sealift Season
- Appendix 37 2020 Community Engagement Table
- Appendix 38 Socio-Economic Monitoring Program
- Appendix 39 2020 Socio-Economic Monitoring Program Report
- Appendix 40 2020 Training
- Appendix 41 Kivalliq Labour Market Analysis
- Appendix 42 NIRB Project Certificate Tracking Table
- Appendix 43 Inuktitut Summaries of Monitoring Results

Comments and recommendations are provided in Section 2 of this technical memorandum.



Technical Review

2.1 **Aquatic Environment Technical Comments**

Reviewer	#	Reference	Comment	Recommendation
HESL on behalf of KIA	1.	Meliadine Gold Project 2020 Annual Report Section 7.8.1 Air Quality Monitoring	Agnico Eagle reports that dustfall monitoring occurs year-round through passive measurement at four onsite sampling stations, and summertime dustfall transect sampling at two locations along the AWAR. Dust suppressant and road watering were applied to AWAR and haul roads in 2020. Agnico Eagle states that "results of dustfall monitoring indicate that for both onsite and AWAR locations, these and other bestmanagement practices in place for dust mitigation are being effectively implemented to minimize emissions" (p. 94). However, it is not clear how monitoring is structured to test the effectiveness of best management practices, such as the use of dust suppressant and road watering. For example, is dustfall compared at locations before and after application of best management practices? Or is dustfall compared between sites receiving best	Agnico Eagle should explain how dustfall monitoring is designed to test the effectiveness of best management practices in use on site. The description of experimental design should include information on location and timing of monitoring in relation to the application of mitigation measures, and information on what comparisons are made to assess effectiveness.
HESL on behalf of KIA	2.	Appendix 15: 2020 Reportable Spills	management practices vs. sites where none are applied? Agnico Eagle reports that on March 19 a crack was noticed in the floor of the SWTP, which caused process water to leak below. It was estimated that approximately 300 m³ of saline water may have leaked through the foundation. The spill report describes the response, clean-up and corrective measures. However, there is no discussion of possible reasons for the crack, nor how long it was likely present before being detected.	Agnico Eagle should discuss reasons for the crack that allowed saline water to seep under the floor at the SWTP, and should estimate how long they believe it was present prior to being noticed.



behalf of KIA Reportable Spills spills. Agnico Eagle reports that at least five spills in 2020 were the result of forklifts puncturing or tipping over containers. These spills spotter requ	Eagle should provide hal information on how the
coagulant, and diesel exhaust fluid. updated to and how the	requirement for the g of containers has been to improve compliance to the mandate will be d across all departments.

Reviewer	#	Reference	Comment	Recommendation
			We would like additional information on how the procedure mandating a spotter is being updated and how it will be enforced across all departments.	
HESL on behalf of KIA	4.	Appendix 15: 2020 Reportable Spills	Agnico Eagle reports that water quality monitoring was conducted during the extraction of the fuel tank found in Meliadine Lake, and that the resulting Golder report is included in Attachment 1. The referenced report does not appear to have been included in the Annual Report.	Please provide a copy of the Golder report on water quality monitoring conducted during the fuel tank extraction in August 2020.
HESL on behalf of KIA	5.	Appendix 15: 2020 Reportable Spills	Spill Report #20-329 indicates that a spill of partially treated sewage effluent occurred on September 11. The Spill Report states that "No water bodies were impacted by this release. The closest natural water body is approximately 275 m away" (p. 171). However, on the Follow Up Report, it is stated that "the closest water body (Meliadine Lake) is approximately 420 m away".	Please clarify the distance to the nearest water body of the sewage spill.
HESL on behalf of KIA	6.	Appendix 15: 2020 Reportable Spills	The distance to the nearest water body should be clarified. The discharge to sea at MEL-26 was halted on September 18 after a TSS exceedance was observed (34 mg/L vs. 30 mg/L maximum authorized concentration in a grab sample). A single truck was identified as the source of the elevated TSS, "due to the truck's tank not being pre-rinsed and inspected efficiently as per the standard operating procedure" (p. 176). Agnico Eagle reports that as a result, the tanks of all trucks will be visually inspected for sediment prior to filling. It is not clear how this new mitigation measure differs from, and adds to, the existing standard operating procedure. What is the procedure for pre-rinsing and inspection, and how has this changed to ensure compliance? What is the frequency of inspection and pre-rinsing?	Please elaborate on the standard operating procedure for inspection and pre-rinsing of trucks prior to filling with discharge. Please explain how the existing procedures have been improved following the TSS exceedance to avoid sediment in truck tanks contributing to elevated discharge concentrations at MEL-26.

Reviewer	#	Reference	Comment	Recommendation
HESL on	7.	Appendix 15: 2020	Agnico Eagle reports that one of the recommendations arising from	Please clarify whether field
behalf of KIA		Reportable Spills	the fuel tank extraction in Meliadine Lake (August 2020) was to	duplicates and blanks are required
			"make sure that for all water sampling campaigns, duplicate and	in all water quality monitoring for
			blanks are taken to ensure that a quality control is available" (p. 51).	the project, and if not, why this
			However, the water quality Certificates of Analysis for the <i>TSS</i>	recommendation has not been
			Exceedance to Marine Environment Final Report (September 30,	implemented.
			2020) do not show that any field duplicates or blanks were	
			collected.	
HESL on	8.	Appendix 15: 2020	Agnico Eagle reports that approximately 10,000 L of diesel spilled on	Please explain why the fuel supply
behalf of KIA		Reportable Spills	September 22 at the main camp due to a mechanical failure of a	system was operating in manual
			valve controlling fuel supply to two emergency generator daily	mode without supervision, and
			tanks. The spill was estimated to occur around 9:30 pm September	what safeguards have been
			22 but was not detected until 6:30 am the following day.	implemented since the spill to
				ensure that automatic shutdowns
			The fuel supply system was operating overnight without human	can function if a similar situation
			supervision. Agnico Eagle reports that "the system was being	occurs in future.
			operated within design specifications with the exception that the	
			fuel delivery pumps were running in manual mode as opposed to	
			automatic. There is an additional safety interlock to shut down the fuel delivery pumps when the daily tanks reach a high-high level	
			alarm at 95% capacity. This would have likely stopped the pumps if	
			they had been running in automatic mode" (p. 244).	
			they had been running in dutomatic mode (p. 244).	
			It is not clear why the system was being run in manual mode	
			without supervision, given that no safety shutdown appears to exist	
			in this mode.	
HESL on	9.	Appendix 15: 2020	On October 3, 2020, a 350 kg spill of ammonium nitrate was	Please indicated how the snow
behalf of KIA		Reportable Spills	discovered, which likely resulted from damage to a sea can caused	management plan and standard
		, ,	by snow removal earlier in the year.	operating procedures safeguard
			,	against accidental puncturing of
			Agnico Eagle reports that as a result, snow clearing operators "will	sea cans (and other containers) and
			be reminded of the importance of following the snow management	

Reviewer	#	Reference	Comment	Recommendation
			plan and standard operating procedures prior to resuming snow	explain how following these
			removal" (p. 263). It is not clear how this plan and procedures protect against accidental puncturing of sea cans.	protocols is enforced.
				Please comment on the fate of the
			The contaminated snow was transported to a snow storage area. Is this part of the landfarm?	contaminated snow in the snow storage area. Is this in the
			this part of the fallacian.	landfarm? Is there additional treatment once the snow melts?
HESL on	10.	Appendix 15: 2020	On November 17, a freshwater pump shack beside Lake B7 caught	Please discuss how it was
behalf of KIA		Reportable Spills	fire. Snow and water from a fire truck were used to extinguish the	confirmed that all contaminated
			fire. Agnico Eagle reports that all contaminated snow and ice was	substrates were removed following
			plowed into a large pile and removed to the Snow Cell for storage	the fire, including what monitoring
			until summer when it could be treated with an oil-water separator.	occurred to determine potential impacts to the lake water quality.
			Agnico Eagle should explain how it was determined that all	
			contaminated substrates were removed. For example, was any	Please explain what caused the fire
			monitoring of the lake conducted during the open water season to	and what steps will be
			confirm that no contamination reached its waters?	implemented to reduce fire risk at pump shacks.
			Agnico Eagle should indicate what caused the fire and what steps	
			will be taken to minimize the risk in future.	
HESL on	12.	Appendix 20: 2020	The Province of British Columbia provides the following guidance	Please discuss how the listed
behalf of KIA		Water Quality	for quality control and quality assurance of water sampling:	exceedances of 20% and 50% RPD
		Management and		thresholds affect the interpretation
		Optimization Plan	If one of a set of duplicate values at or greater than 5 times	of the water quality data. Please
		Tabular Results	the minimum detection limit, then RPD values >20%	also provide location information
			indicate a possible problem, and >50% indicate a definite	for all data listed in the tables.
			problem, most likely either contamination or lack of sample representativeness ¹ .	

¹Province of British Columbia. 2013. Part A – Quality Control and Quality Assurance, Appendix 3 – Quality Assurance Guidelines to Supplement the Standard Effluent and Receiving Environment Quality Assurance Clause https://www2.gov.bc.ca/assets/gov/environment/research-monitoring-and-reporting/monitoring/emre/bc_field_sampling_manual_part_a.pdf



Reviewer	#	Reference	Comment	Recommendation
Reviewer	"	Reference	We note that the relative percent difference (RPD) between samples and duplicates for several parameters are above the 20% and 50% thresholds: • DOC 25.35% at MEL 13-01 July 29 • TDS 45.16%, Cadmium 199.60%, Lead 199.60% no location given, July 19 • Total ammonia 48.28%, no location given, August 23 • TDS 62.07%, thallium 199.60%, no location given,	Recommendation
			 September 5 Aluminum 42.14%, arsenic 21.49%, cadmium 174.36%, no location given, July 12 Turbidity 22.22%, no location given, August 9, and Aluminum 191.67%, no location given, October 4. 	
			The implications of these exceedances of recommended RPD thresholds should be discussed in terms of reliability and representativeness of the data. Note also that locations were missing for several of the above data.	
HESL on behalf of KIA	13.	Appendix 31: 2020 Marine Mammal and Seabird Report	As in our 2019 review, we continue to have concerns about data quality of seabird and marine mammal surveys. Many of the moving seabird surveys in 2020 were missing start and/or end times (14%) and start and/or end locations (20%); similarly 28% of stationary surveys were missing start and/or end times. Surveys with these data gaps were not subsequently used in analyses, providing an	Please explain how inconsistencies in monitoring are being addressed to avoid missing data, which make the corresponding surveys unusable for analysis.
			incomplete assessment of the information gathered. We wish to re-emphasize the importance of quality control and quality assurance in the seabird and marine mammal surveys. Improvements need to be made to the data collection protocol and	Please clarify during how many days the preferred number of surveys for marine mammals and seabirds was achieved.

Reviewer	#	Reference	Comment	Recommendation
			training to ensure consistent, systematic and reliable sampling, to avoid data that are unusable.	Please clarify number codes and species queries in the data sheets.
			Agnico Eagle states that at least one survey per day is required both for marine mammals and for seabirds, although two is preferred for the former, and three is preferred for the latter. Agnico Eagle should indicate how many days of ship transits had the preferred number of surveys for marine mammals and for seabirds in 2020.	
			Some of the information in the seabird data sheets is difficult to understand. For example, what do the number codes refer to in the Behaviour column (e.g., '49' July 21 on p. 148, '60' or '71' on July 18 on p. 151). Similarly, some sightings forms are difficult to interpret. For example, on p. 504-506 what species is 'gorland' under the species column?	
HESL on behalf of KIA	14	Appendix 17: 2020 Aquatic Ecosystem Monitoring Program (AEMP) Report Section 4.3.2	Agnico Eagle states that "in August and September, reduction in survival and growth were observed in full-strength effluent tests as well as some of the replicate treatments from the receiving environment samples. attributed to a bacterial or fungal infection as evidenced by a "fuzzy" appearance on the specimens that deceased." But that the results were "not considered representative of chronic effects to fish from exposure to the effluent or receiving environment water in Meliadine Lake."	Agnico Eagle should provide additional discussion on why the effluent was not deemed a potential cause of survival and growth issues observed during toxicity sampling.
			Additional discussion in warranted on why the effluent was not deemed a potential cause. Could the effluent have left the fish susceptible to the infection?	
HESL on behalf of KIA	15	Appendix 17: 2020 Aquatic Ecosystem Monitoring Program (AEMP) Report Section 5.3.6	Agnico Eagle states that "The combination of high discharge volumes and higher concentrations of certain parameters in CP1, contributed to observed increases for several metals in the NF area in the July sampling event, notably arsenic, cobalt, and manganese (among others)."	Agnico Eagle should revise this section to include a list of all parameters with observed increases and provide discussion on



Reviewer	#	Reference	Comment	Recommendation
			All parameters with observed increases should be listed.	these increases for consideration by reviewers.
			Furthermore, no parameters with elevated concentrations are discussed other than arsenic. Other parameters with elevated concentrations should be discussed as a part of the assessment of the data collected.	
HESL on behalf of KIA	16	Appendix 17: 2020 Aquatic Ecosystem Monitoring Program (AEMP) Report Section 5.3.6	Agnico Eagle states that "In 2020, an increase was observed for both total and dissolved arsenic at MEL-02, with concentrations in the July sampling event approaching 0.6 μ g/L". What makes this result surprising is that concentrations at MEL-02 (the midfield area) were of similar magnitude to both MEL-01 and MEL-13 (at the edge of the mixing zone).	Agnico Eagle should revise this section to include a discussion of mechanism that may have led to marked increases in arsenic.
			No discussion of potential sources is provided. If the increases at MEL-2 are not considered to be the result of the effluent, other mechanisms should be explored.	
HESL on behalf of KIA	17	Appendix 17: 2020 Aquatic Ecosystem Monitoring Program (AEMP) Report Section 6.5	Question 3 of the LAL determination asks "Is there a divergent temporal trend between NF and reference areas?" The brief discussion that follows provides no formal assessment of differences between trends. Based on Section 6.5 it appears TP trends were assessed visually without a formal test to discern differences between temporal trends at the various sites (e.g., reference vs NF).	Please describe how the difference in temporal trends in TP data was assessed.







2.2 **Terrestrial Technical Comments**

Reviewer	#	Reference	Comment	Recommendation
Meliadine Gol	d Pro			
AWR on behalf of KIA	1	S 10.3 AWAR	The traffic volumes along the All-Weather Access Road (AWAR) in 2020 continue to exceed levels predicted for the AWAR in the FEIS by 42% overall (S 10.3, Table 25, pg 108). Traffic volumes during July, which coincided with caribou movement through the site, exceeded levels predicted in the FEIS by 91% (S 10.3, Table 25, pg 108) despite the closure of AWAR over a 10-day period for a total of 165 hours between 7 and 19 July due to caribou migration and no apparent water tanker traffic that month (Appen. 34, 2020 AWAR Usage, Table 1).	Agnico Eagle should clarify whether and when traffic volumes predicted in the FEIS will be attained, and if they won't be attained, what implications this has for assessment of impacts of the project on wildlife.
Appendix 26 2	2020 1	Terrestrial Effects M	Ionitoring and Mitigation Program Annual Report (April 2021)	1
AWR on behalf of KIA	2	TEMMP	Terminology: The Meliadine Project Final Environmental Impact Statement (FEIS) included a Terrestrial Environment Management and Monitoring Plan (V2, November 2015; using 'TEMMP' as the acronym). This Plan and the subsequent update (V3; June 2020) stated that "An annual Terrestrial Environment Monitoring Summary Report for the project will be completed". Appendix 26 to the current annual report is titled "Appendix 26: 2020 Terrestrial Environment Management and Monitoring Plan Report", yet the Golder document after the title page is titled "2020 Terrestrial Effects Monitoring and Mitigation Program Annual Report" (5 April 2021) and uses TEMMP as the acronym. These titles, intermixing of management, monitoring and mitigation, and	Agnico Eagle should clarify the various titles of the TEMMP plans, programs and reports.



			reference to plan or a program, not to mention the use of similar acronyms, are confusing.	
AWR on behalf of KIA	3	S 9.0 Wildlife Observations and S 9.1 Wildlife Track Surveys	Project certificate T&C 118 includes "weekly winter track surveying and summer and fall surveys undertaken on foot twice per month" (Table 1-1, pg 4). Summaries of wildlife observations (incidental observations) are provided in S 9.0 and of wildlife track surveys in S 9.1, but it is unclear if and how the values reported relate, or whether they are integrated. No objectives, locations or methodology are provided for wildlife tracks survey section (S 9.1, pg 32), especially for the summer surveys, and no detailed results are provided other than a summary of overall annual numbers and percentages for different species. In response to KIA comments on the 2019 TEMMP, Agnico Eagle stated that the track surveys are ("are not completed systematically") and deflected further information to after 2021. The KIA suggests that this response is unacceptable. The usefulness of these surveys to wildlife monitoring and mitigation is unclear and requires clarification, sooner rather than later.	Agnico Eagle should clarify the objectives of the wildlife track surveys and present the results in a manner to enable examination of objectives and of spatial and temporal trends over time.
AWR on behalf of KIA	4	S 12.0 Barren- ground Caribou	"A request for access to caribou collar data for this report was submitted to the GN DoE on October 27, 2020. Collar data were not provided to Agnico Eagle at the time this report was completed." (S 12.0, pg 35). Broad movement figures for the Meliadine area would inform timing of patterns of annual variation in interactions of the Qamanirjuaq herd with the mine. Fine scale mapping (e.g., 2019 Meadowbank Annual Report Fig. 6.2 – individual collar trajectories) would provide a visual showing individual collared caribou movement through the mine site and AWAR. The KIA is frustrated that Agnico Eagle is unable to obtain current collar data for use in annual report monitoring, despite an invitation to submit a request	Agnico Eagle and the Government of Nunavut should develop a long-term data share agreement to enable Agnico Eagle to provide figures of collar movements at broad and fine (individual collar trajectories) scales in Meliadine Annual Reports to aid in interpretation of monitoring and efficacy of mitigation.

			from GN on 21 August 2020 (A. Robinson, GN, email) and a formal request sent by Agnico Eagle on 27 October 2020 (TEMMP, pg. 35).	
AWR on behalf of KIA	5	S 12.2 Collared Caribou Inventory	One of the impact prediction thresholds is "<10% caribou deflections from AWAR" to be monitored using ground surveys (Table 2-1, pg 9). The text (pg 40) refers to the 8 January 2021 Golder report (Appendix E) on caribou-AWAR interactions, concluding that between 2014 and 2019 "93% of movements within the LSA crossed the AWAR, other roads and Mine infrastructure" (pg 40). This Golder report was roundly criticized by KIA (memo from 25 January 2021) and the Sayisi Dene First Nation (letter from 29 January 2021). Issues included the 1.5 km zone of influence used to "encounter" the road, definitions of deflection, and not accounting for exposure to insect harassment. Given these concerns, the KIA suggests that the 93% crossing rate of collared individuals is premature and is based on a partial analysis which lacks insight into caribou behaviour. The 2020 collar data were unfortunately not examined for this annual report (see Comment 4, above). The 2020 TEMMP recommends that to "quantify the threshold impact prediction of <10% caribou deflections from AWAR, the number of times a caribou group was deflected from the AWAR should be explicitly quantified as part of the caribou behaviour surveys" (S 12.5, pg 44). The KIA agrees that it would be informative to see these data, but is doubtful whether 30-minute behaviour surveys will adequately address the question of caribou deflection.	a) Agnico Eagle should clarify how 30-minute behaviour surveys will be able to quantify delays and deflections from AWAR. b) Agnico Eagle should conduct a more comprehensive analysis of collared caribou-mine interactions at appropriate spatial and temporal scales and including relevant variables (e.g., insect harassment and daily traffic levels) to ensure that the conclusions are rigorous. This evaluation of caribou movements through the mine site and AWAR should examine displacement/deflection of caribou and responses to operations during migration.
AWR on behalf of KIA	6	S 12.3 Caribou Advisory	Rigorous reporting is required to enable effective adaptive management of caribou and other wildlife at the Meliadine project. Agnico Eagle provided greater details on caribou monitoring, observations and triggers in the 2020 TEMMP report, which the KIA appreciates. Levels 1-3 action levels and the caribou advisories (Table 12-2, pg 41) show trigger distances of 10 and 5 km, distances	Agnico Eagle should clarify how trigger distances of 10 and 5 km are monitored on the lead-up and during migration. This clarification should include whether helicopter surveys

which are far beyond the range of detection from the ground. Twice weekly review of collar maps do not have the temporal resolution to be effective monitoring triggers at these spatial scales (especially given delays in collar downloads and map generation). There is no mention in the TEMMP of aerial surveys to determine caribou abundance at distances beyond visual range (~3 km at the outside limit), however, the Meliadine caribou migration protocol presentation (Appen. 25, 2020 Toolbox Presentations, pdf pg 71) indicates "Helicopter flights will be completed mid to late June to assess herd general proximity to Meliadine".

are part of monitoring and how these surveys are conducted.

Appendix 29: 2020 Caribou Behaviour Study (March 2021)

AWR on	7	2020 Behaviour
oehalf of KIA		report

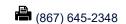
The 2020 behaviour report is well written with clearly presented methods, results and interpretation. Caribou closer to the road were more likely to cross, but this could be confounded by the 30-minute scan period, restricting the observers from determining the ultimate "fate" of groups initially located further out from the road. The KIA agrees that inclusion of information on harvesting activities and traffic levels would strengthen inferences about caribou behaviour near the road.

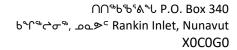
However, while the behaviour report (Appendix 29) makes fair and balanced conclusions from the results, the TEMMP report states that "The fact that there are individuals, and not large groups, near the road would suggest that the road is not seen as a threat as herding is a predator swamping behaviour" and "...caribou observed during the surveys may be further from the road because they are not planning on crossing the road at the survey location" (TEMMP, S 12.1.2, pg 37). These statements are totally unfounded and not supported by the data. A more plausible interpretation is that caribou are likely further from the road because, as noted in the behaviour report, it "may be indicative of a trend that caribou tend to avoid areas within 100-300 m of the road unless they intend to cross it"

- a) Agnico Eagle should clearly clarify how the behaviour 30-minute scan surveys will be able to assess whether <10% of caribou are deflected from the AWAR, as noted in TEMMP Table 2-1 (pg 9).
- b) Agnico Eagle should justify their conclusions regarding caribou perception of the AWAR as nonthreatening (implying little perceived risk?) and caribou decisions on where to cross the road.
- c) Agnico Eagle should consider added to their behaviour analysis the side of the road the caribou group being scanned is on.



			(Behaviour report, S 6.3.1, pg 11). Caribou movement through AWAR generally occurs east to west. Caribou behaviour and movements appear to differ whether they are on the 'upstream' or 'downstream' side of roads (see Boulanger et al. 2020). Analysis of the behaviour data may benefit by addition of a covariate whether the group being scanned was on the up- or downstream side of the migration.	
Appendix 24 - 2020 Air Quality Monitoring Report (March 2021)				
AWR on behalf of KIA	8	Air quality reporting	The 2020 Air Quality Monitoring Report includes details on dust suppressant application, and the KIA appreciates Agnico Eagle's inclusion of these data. Figure 19 (pg 26; as well as Figures 20 and 21) indicates that maximum dustfall values were consistently higher on the upwind side of the road (if negative values in the figure represent the west/upwind side of the road, as indicated in the figure caption). This seems contrary to what would be expected for dust deposition adjacent to a road.	Agnico Eagle should clarify why dustfall values are consistently higher on the upwind side of the AWAR.







3. Closing

KIA appreciates the opportunity to provide comments on the 2020 Annual Report for the Meliadine Gold Project. Please contact Luis Manzo, Director of Lands, should you require more information.

Regards,

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