

APPENDIX C
RESPONSE TO SUMMARY OF ISSUES



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#	COMMENT	RESPONSE
ACCIDENTS AND MALFUNCTIONS		
1	Need for information on how the Proponent will prevent accidents and malfunctions associated with construction and operation of project components in light of the existing historic mine infrastructure	<p>Agnico Eagle Mines (Agnico Eagle) is committed to maintaining the highest health and safety standards possible. Agnico Eagle’s long-term goal is to strengthen health and safety culture through individual accountability and leadership, accompanied by aspirational zero harm safety targets and leading performance indicators. Agnico Eagle considers safety of people and the environment at the Upper Beaver site a priority. The proposed open pit mine will provide economic benefits, but will also mitigate known hazards related to the stability of historic underground workings, as well as removal of the historic mining legacies, such as tailings currently adjacent and within York Lake (see Section C.3.4 of the Detailed Project Description; DPD). The placement of proposed infrastructure (such as the processing plant and tailings storage facility) fully consider the location and stability of underground workings. Agnico Eagle will continue to assess the ongoing hazards and potential for accidents and malfunctions related to the historic at the site during future activities.</p> <p>Should an Impact Assessment (IA) be required Agnico Eagle will fully consider and will document the proposed management of accidents and malfunctions associated with the historic mining operations at the site in the Impact Statement (IS).</p>
2	Potential effects—including effects on human health and to surface water —of accidents or malfunctions—including spills of hazardous substances or uncontrolled release of pollutants to the environment from transportation of hazardous materials, and failures of project components including the open pit, tailings storage facility, pond liners, and dams—and potential for residual effects following an accident or malfunction	<p>Agnico Eagle believe that there will be limited potential for accidents or malfunctions related to the Upper Beaver Gold project with the proposed robust project design that is protective of the environment, along with appropriate design and monitoring safeguards, and practical environmental management practices (see Section F.7 of the DPD). This is one of the reasons Agnico Eagle is considering a filtered tailings stack that does not include / require ponding of effluent rather than a conventional tailings facility, significantly reducing the risk related to water management.</p> <p>Should an IA be required Agnico Eagle will identify and document the management of potential accidents and malfunctions that are applicable to the project in the IS.</p>
3	Need for information on emergency response plans and procedures based on potential accidents and malfunctions	<p>Being prepared to respond to all forms of emergencies remains a key element of the Agnico Eagle health and safety program. Each of our mining operations has its own Emergency Response Plan and has appropriately trained personnel.</p> <p>Agnico Eagle will establish appropriate, practical emergency response plans and procedures for the Project prior to construction, that meet Corporate requirements,</p>



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		<p>as well as any regulatory needs. Development of appropriate environmental management plans are one of the anticipated mitigation measures that will be discussed in the IS for malfunctions and accidents, if an IA is required.</p> <p>Environmental and health and safety impacts are managed through our Risk Management and Monitoring System. Activities that can have environmental impacts are identified and assessed. Relevant control measures are implemented, maintained and verified. Emergency response plans are developed and tested. Every mine and exploration project reports environmental incidents into our internal online database and tracking system. Each operation has a dedicated environmental department that ensures environmental impacts and incidents are managed according to the approved and applicable procedure.</p>
4	Need for information about plans for communication with local residents in cases of accidents and malfunctions, including translation into local Indigenous languages	As part of the management plan a protocol from communications will be established with local residents and local Indigenous Nations. If appropriate in discussion with the individual Indigenous Nations, Agnico Eagle may prepare plain language summaries of these plans, including translation in Indigenous languages if requested.
ACOUSTIC ENVIRONMENT		
5	Potential effects from increased noise levels during all phases of the Project on human health and recreational activity	<p>It is recognized that despite meeting all regulatory requirements including the applicable Provincial noise guidelines associated with Part II.1 of the <i>Environmental Protection Act</i>, the construction, operation and closure of an industrial facility will change the local acoustic environment (see Tables F.2 and F.3 of the DPD). The Health Canada (2019): <i>Guidance for Human Health Impact Assessment in Environmental Assessments</i> will be fully considered and assessed as appropriate in the IS, if an IA is required.</p> <p>The potential for generation and propagation of noise will be fully considered in the final Project design. Modelling will be completed to assess the effects and practical noise mitigation measures will be utilized to limit the potential effect on human receptors and their periodic recreational activities in the area. It is expected that the sound levels will be reduced after the first few years of construction / operation when the Project is only mining from underground.</p>



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6	Need for further information on noise effects, identification of human receptors, proposed noise mitigation measures and monitoring and follow-up measures	Agnico Eagle has identified a number of potential human receptors in the Initial Project Description (IPD; Figure C.2: Land Tenure and Land Use) and the DPD (Figure D.2). Modelling will be completed to assess the effects on identified human receptors in the area based on occupancy and land ownership. The modelling will be informed in part, by the noise baseline field investigations completed during 2021. Based on the preliminary modelling results, the Project design and activities will be modified to ensure that the Provincial requirements are met. Noise will be monitored during construction and operation if warranted.
ALTERNATIVE MEANS		
7	Need for an analysis of alternative means for carrying out the Project that considers alternatives to the proposed operation schedule and alternatives to mineral extraction options that considers stability concerns related to bedrock competence and historical mine workings. The alternatives analysis must also consider adverse and positive effects to the local social and economic conditions	As indicated in the IPD, a portion of the ore body proposed for underground mining that is key to the economic viability of the Upper Beaver Gold project is located at relatively shallow depth near York Lake. As a result of this assessment of rock stability associated with the historic underground works and pre-existing natural conditions, Agnico Eagle determined through expert studies that a combination of open pit and underground mining was required (see DPD Section C.3.4). This would mitigate short and/or long term instability concerns, and would provide the opportunity to rehabilitate the historic tailings and mine rock located in and beside York Lake. Further detail regarding alternative means of meeting the purpose of the Project will be provided in the IS, if an IA is determined to be required.
8	Need for an analysis of alternative means for carrying out the Project that considers carrying out the Project without draining York Lake and diverting the Misema River	Based on expert studies completed during 2020, Agnico Eagle has not identified any feasible alternative means of carrying out the Project that meet the purpose of the Project (see DPD Section C.3.4). Nonetheless, further detail regarding alternative means of meeting the purpose of the Project will be provided in the IS, if an IA is determined to be required (see DPD Section C.6).
9	Need for an analysis of alternative means for carrying out the Project that considers alternative methods and locations of tailings storage, and associated effects of alternatives to groundwater quality due to acid rock drainage and metal leaching	As identified in the IPD technically and economically feasible alternative means will be considered during future regulatory documentation, including potentially the following tailings storage methods (dry stack facility or conventional slurry facility, co-deposition, re-use as backfill underground) and locations (see DPD Section C.6). Preliminary geochemistry results related to the advanced exploration program indicate that there is overall an abundance of neutralization potential, and acid rock drainage and metal leaching is not of concern (see DPD Section D.7.2). Geochemical investigations and laboratory testing for the mining phase are ongoing and will



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		<p>presented in the IS, if an IA required. Should the results determine that mitigation measures are required for potential effects related to acid rock drainage and metal leaching, these measures will be described in the IS, including assessment of alternative means as applicable (such as tailings deposition methods).</p>
10	<p>Need for further information on the process for planning the proposed road network, including how the Proponent considered cultural and environmental valued components in planning</p>	<p>The road network shown in the preliminary site plan in the IPD (Figure B.1: Preliminary Site Plan) was selected to minimize new disturbance to the natural environment, and avoidance of known archaeological sites and water crossings.</p> <p>The site plan has been revised in the DPD (Figure C.1), and is expected to be updated further in the IS, if an IA is required. Ongoing Project design will consider all known cultural values, including any items shared with Agnico Eagle by local Indigenous Nations.</p>
11	<p>Potential effects of ore processing and mine effluent on fish and fish habitat associated with alternative means of carrying out the Project and a description of whether effects on fish and fish habitat were considered as a criterion in the alternatives selection</p>	<p>Potential effects on fish and fish habitat were considered as a criterion in developing the preliminary site plan / selection of the preferred alternative, recognizing that the Project is not economic and will not proceed without the mining of the ore near historical underground mine workings situated at York Lake.</p> <p>It is acknowledged that the dewatering of the York Lake will have an effect on fish and fish habitat. Direct impacts to fish habitat include overprinting of waterbodies and construction of structures in waterbodies / watercourses. Anticipated indirect impacts to fish habitat may include flow reductions in some of the small unnamed tributaries immediately adjacent to site development.</p> <p>An approved fish habitat offset and compensation plan will be required and an alternative assessment for mineral waste disposal in the prescribed format will also be needed. These documents are anticipated to be developed in parallel with the IA if required, and potentially submitted in draft with the IS documentation. Agnico Eagle is committed to consulting local Indigenous Nations, stakeholders and communities on projects that can be proposed to the Agency for the compensation plan.</p>



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ATMOSPHERIC ENVIRONMENT		
12	Need for updated baseline studies for air quality, including measurements of nitrogen dioxide, sulphur dioxide, dust (total suspended particles), PM10, PM2.5, carbon monoxide, ozone, volatile organic compounds (VOCs), polycyclic organic compounds (PAHs), metals and other substances that may be released	<p>An air quality baseline investigation was initiated during 2021 at the Upper Beaver Gold project site, designed to supplement the existing dataset and regional published information while recognizing there is no grid power currently available at the site (see DPD Section D.7.1).</p> <p>The data will be summarized, and included in regulatory documentation as appropriate, including within the IS if an IA is required.</p>
13	Need for air quality dispersion modelling to conduct the effects assessment	The potential for generation of air emissions will be fully considered in the final project design and will be based in part on air dispersion modelling to be completed to support regulatory requirements. Modelling will be completed to assess the effects and develop practical air emission and dust mitigation measures. The modelling will be used to confirm that applicable Provincial air quality guidelines can be met per the <i>Environmental Protection Act</i> , during the construction, operation and closure of the mine.
14	Potential effects on air quality during all phases of the Project due to activities including exhaust emissions from diesel combustion, fugitive dust, and vehicular traffic	Agnico Eagle will assess potential for effects from the project during all mining phases, including from heavy equipment, dust and traffic as suggested. Further detail will be provided in the IS, if an IA is determined to be required.
15	Need for further information on proposed mitigation measures for effects on air quality and monitoring plans	Mitigation measures will be included in the project design and activities as needed based in part on the results of the air quality dispersion modelling, to make sure that all regulatory requirements are met. Further detail will be provided in the IS, if an IA is determined to be required.
16	Potential effects of light pollution from the Project. Need for further information on proposed mitigation measures and monitoring plans	Safe operation of an industrial facility will cause a localized light spill that is visible off site. Care will be taken to ensure lights are properly aimed to minimize offsite light disturbance. An ambient light baseline study is currently underway to document baseline characteristics (see DPD Section D.7.1). Further detail will be provided in the IS regarding potential effects and proposed mitigation measures, if an IA is determined to be required.



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CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS		
17	Need for further information on net greenhouse gas emissions for each separate phase of the Project (e.g. carbon footprint), including information on which greenhouse gases will be measured and reported publicly, and methodology used. Information provided should be aligned with the Government of Canada's Strategic Assessment on Climate Change (www.strategicassessmentclimatechange.ca)	Agnico Eagle recognizes the important role that industry plays in addressing climate change and is actively working on initiatives to help reduce our carbon footprint and mitigate climate change risks, while continuing to grow our operations. An assessment of potential greenhouse gas (GHG) emissions for each phase of the project will be conducted as part of the IS aligned with the Strategic Assessment on Climate Change, if an IA is determined to be required. The Upper Beaver Gold project has a relatively small GHG footprint compared to many industrial operations, including as a result of the decision to use grid power rather than diesel-fired generators for site power.
18	Need for further information on potential project effects on carbon sinks, such as nearby wetlands	<p>Terrestrial field programs completed in the past, including during 2021 will allow the development of mapping showing ecosystems that may be affected by the project. As the majority of the project is located in an upland area, there will be limited direct or indirect effects to wetlands. A new figure has been included in the DPD that shows a preliminary identification of local wetlands based on published information (Figure D.5).</p> <p>The majority of the site has been previously disturbed through past forestry, exploration or mining activities, or will be disturbed by the proposed advanced exploration program, but some areas to be affected remain a more natural condition. A compact site for the new mine will be developed to limit disturbance to new areas as reasonable. The site will be reclaimed including by revegetation after mining ends to support future productive habitat and support sequestration of carbon in soil by plants.</p>
19	Need for further information on the Project's impact to Canada's ability to meet its climate change target and environmental obligations	<p>As described in the IPD, the Upper Beaver Gold project will not have a material affect GHG generation in Canada. As with virtually all industrial operations, greenhouse gases will be emitted during all phases of the project (construction, operation and closure). The primary sources of greenhouse gas emissions from each project phase are expected to be:</p> <ul style="list-style-type: none"> • Construction: diesel combustion in mobile equipment; • Operation: diesel combustion in mobile equipment, blasting in the open pit and underground, processing or ore and indirect emissions from purchased grid power; • Closure: diesel combustion in mobile equipment ((see DPD Section F.5).



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		Agnico Eagle is reviewing technology / design alternatives that may reduce GHG emissions, such as use of electric equipment / vehicles. An assessment of potential GHG emissions will be completed for each phase of the project and will be compared to Canada's commitments re: GHG emissions.
CUMULATIVE EFFECTS		
20	Potential cumulative effects - due to current and historical mineral exploration activities, existing mine hazards, nearby forestry activities, downstream water control structures and hydroelectric developments - on wildlife, surface water and groundwater quality and quantity, fish and fish habitat, human health, and social conditions in the surrounding watershed and downstream of the Project	Agnico Eagle is purposefully developing the Upper Beaver Gold project (the mine), to expand and/or modify facilities that are being developed during the advanced exploration program in order to minimize environmental disturbance as practical. The <i>Impact Assessment Act</i> requires that cumulative effects be considered that are likely to result from the designated project in combination with other physical activities that have been or will be carried out. For the Upper Beaver Gold project, it is anticipated this would include cumulative effects associated with the exploration program and advanced exploration program at the site as the Upper Beaver Gold project is expected to have a small footprint, as well as a limited area of influence. Cumulative effects will be assessed in the Impact Statement in accordance with Impact Assessment Agency of Canada guidance, if an IA is required.
21	Potential cumulative effects on Indigenous groups including on their traditional territories and cultural land use practices such as hunting, fishing or traditional plant harvesting	Should an IA be required for the Upper Beaver Gold project, a cumulative effects assessment will be completed which include consideration of effects on Indigenous Nations. Agnico Eagle is actively seeking information regarding traditional territories and cultural land use practices from local Indigenous Nations, and this information will inform the IS, including the cumulative effects assessment.
22	Potential cumulative effects on the exercise of Aboriginal and/or treaty rights from the Project in combination with existing projects, such as other mining activities and forestry	A cumulative effects assessment will be completed which includes consideration of Aboriginal and/or treaty rights with respect to existing projects, should an IA be required for the Upper Beaver Gold project.
23	Need for further information on the area of influence that is being considered for the assessment of potential cumulative effects	The Upper Beaver Gold project has a small footprint and as a result of the need to meet all regulatory requirements a limited area of influence with respect to the natural and biological environment. Cumulative effects will be assessed in the Impact Statement in accordance with Impact Assessment Agency of Canada guidance, if an IA is required.



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DECOMMISSIONING AND RECLAMATION		
24	Need for further information on plans for decommissioning and reclamation which include consideration of historical mine hazards located on site and information on disposal of solid wastes generated during decommissioning	<p>Progressive and final reclamation of the Upper Beaver Gold project site, including of historic mine hazards will be governed by the Ontario <i>Mining Act</i>, and its associated Regulations and Codes, and will be informed by ongoing engagement, including with Indigenous Nations. The Act requires that a Closure Plan be filed for mining project before construction, and that financial assurance be provided to ensure that sufficient funds are in place to carry out the decommissioning activities. Information regarding the historical mine hazards was provided in Tables B.1 and B.3 in the IPD; this information is repeated as Tables C.1 and C.3 of the DPD.</p> <p>A conceptual closure plan will be provided with the IS, should an IA be determined to be required. The IS will also consider alternatives the meet regulatory requirements for disposal of decommissioning solid wastes.</p>
EFFECTS OF THE ENVIRONMENT ON THE PROJECT		
25	Need for further study on the effects of, and resilience of, project infrastructure - including tailings storage facilities, waste management areas, site drainage and water diversion structures - to climate change	<p>The Upper Beaver Gold project has an expected life of approximately 14 years or more years of operation, plus construction, decommissioning and closure phases. The project does not include any long term water impoundments.</p> <p>Expected climatic conditions will be fully considered in the design of project facilities and infrastructure as applicable, including any potential changes from the current climate due to climate change based on accepted models. Should an IA be determined to be required, the effect of climate change on project facilities and infrastructure will be assessed and documented in the IS.</p>
26	Need for mitigation measures and characterization of residual effects related to the effects of the environment on the Project	Assuming that an IA is required, the IS will assess the effects of the environment on the Project, including climate changes, but also potentially including such aspects natural hazards.
FISH AND FISH HABITAT		
27	Need for baseline studies on fish and fish habitat, including biological indicator species, such as benthic invertebrate species, and further information on the baseline sampling program	Baseline aquatic investigations have been ongoing in the area since 2011, with a greater focus since 2018. The 2021 aquatic resources baseline studies were designed to fill potential gaps in the existing aquatic information from previous studies (see DPD Section D.7.5). Fish habitat characterization and fish community surveys within the Victoria River, as well as Beaverhouse Lake, Ava Lake, York Lake and the Misema River were completed during 2021. A lethal fish sampling program was also completed during the fall site visit to measure contaminants in fish tissue for lower trophic species (e.g., baitfish/forage fish) and upper trophic predatory species (e.g.,



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		<p>sportfish – walleye and northern pike). Sediment quality samples were collected to measure metals, nutrients and other baseline contaminants of potential concern, which were used to help interpret the benthic invertebrate community survey results collected during the program. Surface water quality samples were also collected at lake sample locations where discrete depth interval sampling occurred (near-surface, mid-column and near-bottom), as well as lower trophic level sampling including Chlorophyll-a and zooplankton community and biomass.</p>
28	<p>Need a full list of project components, including additional details about components to determine potential for effects to fish and fish habitat</p>	<p>The DPD provides a list of the project components as currently known (see DPD Table C.2), expanding on the details provided in Table B.2 of the IPD (Preliminary List of Mine Facilities and Comparison to Advanced Exploration Facilities).</p> <p>In addition, DPD Table F.2 (Preliminary Summary of Potential Environmental Effects) has expanded the original table in the IPD (Table E.2) to identify potential for effect to fish and fish habitat as a discrete environmental component, not linked to local waterbodies / watercourses.</p>
29	<p>Potential effects on fish and fish habitat - including fish spawning and aquatic invertebrates - due to project components and activities such as blasting, dewatering of York Lake, dams, water diversion structures, tailings storage facility, waste rock stockpiles, overburden stockpiles, and ore stockpiles</p>	<p>As indicated in the comment, there could be potential effects from the Upper Beaver Gold project related to project components and activities such as blasting, dewatering of York Lake, establishment of dykes to allow diversion of the Misema River, as well as the overprint of minor watercourses directly by mineral wastes. There may also be potential effects on fish and fish habitat from flow reductions in minor watercourses downstream of the overprinting.</p> <p>Further detail will be provided in the IS related to potential effects on fish and fish habitat, should an IA be required.</p>
30	<p>Potential effects on fish and fish habitat from changes to surface water and groundwater due to the Project, including from acid rock drainage and metal leaching</p>	<p>Preliminary geochemistry results related to the advanced exploration program indicate that there is overall an abundance of neutralization potential. Geochemical investigations and laboratory testing for the mining phase are ongoing (see DPD Section D.7.2) and will be presented in the IS, if an IA is required. Should the results determine that there could be potential effects related to fish and fish habitat, these will be described in the IS along with proposed mitigation measures.</p>
31	<p>Need for further information on whether any fish habitat is proposed to be established in the flooded open pit</p>	<p>The preliminary plan is to re-connect the re-filled open pit (pit lake) to the Misema River system on closure, which will increase the overall lake size for future uses (see DPD Section D.3.4). The viability of developing fish habitat in the pit lake will be considered as part of the fish habitat compensation and offsetting plan.</p>



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32	Need for further information on mitigation measures and monitoring plans, including a characterization of residual effects and the Proponent's plans for developing a fisheries offsetting plan under the <i>Fisheries Act, 2019</i>	<p>A plan for habitat compensation will be developed which will be consulted upon and approved through a rigorous federal process, and when implemented, will mitigate effects to aquatic resources including habitat loss such as at York Lake.</p> <p>Compensatory aquatic habitat, which will be consulted upon and approved through a rigorous federal process, will be provided to mitigate effects to aquatic resources, including habitat loss.</p>
GEOLOGY AND SOILS		
33	Need for baseline geochemical studies of waste rock, overburden, ore, tailings, construction rock, and pit walls	<p>In 2018, a geochemistry study was initiated to investigate the potential for metal leaching and acid rock drainage (ML/ARD) from representative mineral waste material that would be produced during the Advanced Exploration program, including 93 mine rock and 15 ore samples. All samples underwent acid base accounting and metals analysis, and a subset was submitted for shake flask extraction testing and mineralogical analysis. Four humidity cells were also initiated representing different sulphur contents of the two major lithologies, to provide a better understanding of the kinetic behaviour of sulphide oxidation and associated metal release rates.</p> <p>A Phase 2 geochemical program has been initiated to assess geochemistry aspects associated with the proposed mine. It includes:</p> <ul style="list-style-type: none"> • Sampling and analysis of additional mine rock and ore to meet spatial and lithological data gaps for the proposed underground mine; • Sampling of mine rock anticipated to be produced by the open pit; • Characterization of anticipated tailings from processing; and • Additional representative kinetic tests (see DPD Section D.7.2). <p>These data are anticipated to be available to support the effects assessment within the IS, if an IA is determined to be required.</p>



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34	Need for further information on plans for managing and rehabilitating historical contamination disturbed or overprinted due to the Project, including historical waste rock stockpiles and tailings storage areas, and standards to be achieved	There is no known historical contamination of the site, apart from the historic mine rock and tailings storage areas. As indicated in the IPD and DPD, these areas will be excavated as part of the open pit development (DPD Table C.1). These materials will be tested and an appropriate disposal / storage strategy developed. As the materials have been exposed to the environment for a long period of time, it is expected that the quality will be suitable for storage on site in surface stockpile(s) or underground. This information will be detailed in the Closure Plan required by the Ontario <i>Mining Act</i> , and described as appropriate to assess environmental effects within the IS, should an IA be required.
35	Need for further information on construction of trails and trenching, including effects due to erosion and the potential for effects on soil quality	There are no proposed construction of trails or trenching associated with the Upper Beaver Gold project. Should trails be constructed, such as to access environmental monitoring locations, appropriate measures will be taken to minimize potential for soil erosion.
FEDERAL LANDS		
36	Need for further information to validate the claim that there are no expected project changes to the environment on federal lands	There are no federal lands near the proposed project development area or in the local area surrounding the Upper Beaver Gold project property ((see DPD Section E.2). The closest federal lands are First Nation Reserve lands located more than 40 km north of the site, in a different watershed system.
HUMAN HEALTH AND WELL-BEING		
37	Concern about the release of air quality contaminants from mining operations, such as dust from the tailings and metals, and associated impacts on human health	The potential for generation air emissions will be fully considered in the final Project design and will be based in part on air dispersion modelling to be completed to support regulatory requirements. Modelling will be completed to assess the effects and develop practical air emission mitigation measures. The modelling will be used to confirm that applicable Provincial air quality guidelines can be met per the <i>Environmental Protection Act</i> , during the construction, operation and closure of the mine. If it is determined that an IA is required, an assessment will also be made of expected air emissions from the project on human health in the IS.
38	Need for further information on potential impacts on human health from exposure to air pollutants and increased noise levels – including identification of human receptors - and proposed mitigation measures and monitoring plans	Air and noise emissions will be required to meet the Ontario regulatory requirements, including at the property boundary / receptors as applicable. Mitigation measures, including project design elements and application of management practices may be required. Should an IA be required, potential effects



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		from air emissions and noise levels will be assessed in the IS. The IS will also include a description of proposed mitigation measures and if warranted, a preliminary approach to environmental monitoring.
39	Need information on potential electric and magnetic field impacts on human health due to proximity to transmission lines	A 115 kilovolt transmission line is proposed to support the Upper Beaver Gold project. The preliminary routing is through an undeveloped area and is not within kilometres of a human residence. To date, a large number of independent scientific bodies and International health agencies have been unable to establish from their research reviews that there is a health risk from exposure to electric and magnetic fields associated with transmission line. There are no potential electric and magnetic field impacts expected to human health due to proximity to transmission line for the Upper Beaver Gold project.
40	Need for further information on drinking water sources in the vicinity of the Project - including locations of potable water sources and groundwater wells for water consumption – and potential impacts to health	Based on published sources and discussions with local individuals, Agnico Eagle understands that bottled water is used for drinking water, or water is taken from surface water courses / waterbodies. The closest potable wells are believed to be located in Dobie, Ontario (Ministry of Environment, Conservation and Parks well records). A review of known sources of potable water near the Project footprint will be completed in order to assess potential for effects. If it is determined that an IA is required, an assessment will also be made with respect to human health in the IS.
41	Need for further information on potential impacts on human health from exposure to contaminated surface water, including proposed mitigation measures and monitoring plans	Surface water that comes into contact with site facilities will be collected, and treated if needed to ensure the quality is acceptable prior to discharge off site. Effluent discharges to the environment from the site will be required to meet regulatory requirements, which will fully consider the capacity of the receiver. There are no anticipated impacts to human health from exposure to contaminated surface water.
42	Potential adverse impacts on health and safety of local communities, due to an increased number of workers in the area	The Upper Beaver Gold project is located in historic mine district which has had an overall population decline according to available Census data. Over the past 35 years, the population has declined by more than one-third from 12,000 in 1986. The project is not expected to result in a large change in regional or local population but may contribute to modest growth in the base population within commuting distance from the site. If an IA is determined to be required, the IS will assess the potential for adverse impacts on health and safety of local communities due to increases in local project workforce.



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43	Need for further information on potential impacts on mental health and well-being from items such as changing behaviour patterns of food consumption, substance use, and physical activity	<p>The Upper Beaver Gold project is located in an area of long-standing development. Agnico Eagle does not believe the proposed mine development will result in changing behaviour patterns of food consumption, substance use, and/or physical activity.</p> <p>Agnico Eagle believes that the overall effect from the Upper Beaver Gold project to local communities and Indigenous Peoples can be positive, particularly with respect to economic conditions. Key initiatives to support this effect include the ability to participate in employment and business opportunities (for individuals, as well as Indigenous Nations). If an IA is determined to be required, the IS will assess the potential for these positive effects.</p> <p>Agnico Eagle intention is to maximize the hiring of local and regional workers. This commitment contributes generally to increase the level and the quality of life in communities where Agnico Eagle operates such as: increased household income, greater social cohesion and attachment to the communities and more services.</p>
44	Need for further information in the community health profile to include health outcomes from the social context section of the Initial Project Description	Additional information as available from published sources or shared with Agnico Eagle, will be provided in the IS to provide context for the assessment of effects, if an IA is required.
45	Need for further information on the project's effects to the linkages between social, economic and cultural conditions, and health conditions	If it is a determined that an IA is required, through engagement and research the linkages will be identified and potential effects between these linkages will be assessed.
46	<p>Need for the air quality, noise, drinking and recreational water quality, country foods and human health risk assessments be conducted in accordance with Health Canada's Guidance documents for evaluating human health impacts in environmental assessment:</p> <p>Air Quality (https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-air-quality.html)</p> <p>Noise (https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-noise.html)</p> <p>Drinking and Recreational Water Quality</p>	If it is determined that an IA is required, a human health and ecological risk assessment will be conducted in accordance with Health Canada guidance, and will be appended to the IS.



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	<p>(https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-water-quality.html) Country Food (https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-country-foods.html) Human Health Risk Assessment (https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-risk-assessment.html)</p>	
INADEQUATE DOCUMENTATION		
47	<p>Need for further information about the Proponent, including how any recent partnership agreements may affect the Project</p>	<p>Agnico Eagle Mines Limited and Kirkland Lake Gold Ltd. announced on September 28, 2021, that they have entered into an agreement to combine in a merger of equals, with the combined company to continue under the name “Agnico Eagle Mines Limited” (see DPD Section A.2). The merger will create unique opportunity to unlock significant operational and strategic synergies along the Abitibi / Kirkland corridor and to leverage sector-leading technical expertise. These opportunities include the consolidation of one of the largest gold mining camps in the world, enhanced engineering, procurement, logistics and warehousing capabilities, sharing of best practices, acceleration of automation and electrification, and the consolidation of camp infrastructure.</p> <p>The two companies also share a common culture of sustainable mining practices and community engagement and support. Possible synergies with the Upper Beaver Gold project will be further assessed after the completion of the merger and, if conclusive, will be integrated to the Upper Beaver project design and IA. Agnico Eagle will remain a leader in environmental, social and governance matters, committed to maintaining a strong workforce and culture, robust Indigenous peoples, community and stakeholder relations.</p>



APPENDIX C: RESPONSE TO SUMMARY OF ISSUES

#	COMMENT	RESPONSE
48	Need for defined spatial boundaries for the Project, including rationale for the areas	<p>The spatial boundaries for the Project are constrained by land ownership as shown in Figure C.2 (Land Tenure and Land Use) in the IPD, and updated in DPD Figure D.1), with the exception of the transmission line which is anticipated to be constructed on Provincial Crown land.</p> <p>Should additional lands be acquired, there is the potential that other alternatives, particularly for mineral waste could be considered. These will be assessed in the IS if it is determined that an IA is required.</p>
49	Need for completed updated baseline studies to identify if the Project will have positive or adverse effects within federal jurisdiction or adverse direct or incidental effects, to assess the required mitigation measures and monitoring plans	<p>Environmental baseline studies have been completed previously or are ongoing in a number of areas (see DPD Section D.7), including related to fish and fish habitat as defined in subsection 2(1) of the <i>Fisheries Act</i>; and migratory birds, as defined in subsection 2(1) of the <i>Migratory Birds Convention Act, 1994</i> which are within Federal jurisdiction.</p>
50	Need for information on land ownership - including ownership of lands for the water diversion structures, and the access road to local cottages	<p>With the exception of the transmission line and a potential aggregate source which is anticipated to be on Provincial Crown land, Agnico Eagle owns the mining and the surface rights where the proposed mining facilities are proposed to be located.</p> <p>All land adjacent to waterbodies where the water diversion structures are proposed are also owned by Agnico Eagle, but there is a reserve to the crown for the surface rights on and over a strip of land of one chain (21.12 metres) along the shore of the lake.</p> <p>The main access road used by the local cottagers, Beaverhouse Road, which is also the access for the project, passes over private land mainly owned by Agnico Eagle. Based on information found, the Beaverhouse Road would be an Access Road as per the <i>Road Access Act</i>. The Court of Appeal held that an access road under the Act is <i>a road on land not owned by a municipality; it is not a public highway; and it serves as a motor vehicle access route to one or more parcels of land.</i></p>
51	Need for further information on the ore deposit	<p>Probable mineral reserves have been estimated for the Upper Beaver Gold project of 8.0 million tonnes grading 5.43 grams per tonne gold and 0.25% copper (containing 1.4 million ounces of gold and 19,980 tonnes of copper) as of December 31, 2020. Exploration activities are still ongoing to convert mineral resources to mineral reserves.</p>



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#	COMMENT	RESPONSE
		<p>Extensive exploration has been completed within a 10 km radius of Upper Beaver Gold project site, and is still ongoing to better define the potential of other sites. The level of knowledge of other potential deposit around is less defined and will evolve in the future. Further assessment and exploration will be required to confirm potential of other development.</p> <p>Development of other ore bodies will be required to meet all federal and provincial regulatory processes at the time, and accordingly, may require completion of an additional IA process.</p>
52	Need for further information and design of all proposed project components - including the processing plant, dams, diversion channels, new roads (public and on-site), aggregate sources (including locations and access routes) and the transmission line	Further information regarding the proposed project, including facilities and activities will be provided in the IS, if an IA is required. Where appropriate alternative methods will also be provided in order to provide additional clarity on the rationale for the preferred project components.
53	Need for further information on hazardous chemicals used on site	<p>Hazardous chemicals will be required at the Upper Beaver Gold project, as are required at most industrial establishments. The chemical reagents that will be used in ore processing and for wastewater treatment at the site are typical for a mine operating in Ontario. All process reagents will be stored according to supplier and safety guidance, in separated and as applicable, contained areas. Reagent mixing systems will also be located within containment areas to contain any spills and prevent incompatible reagents from mixing. Storage tanks will be equipped with level indicators, instrumentation and alarms to ensure spills do not occur during normal operation.</p> <p>The primary reagents (or similar) required to process the ore are expected to include: lime, sodium cyanide, sodium hydroxide, hydrochloric acid copper sulphate pentahydrate, sodium metabisulphite, flocculant, coagulant, potassium amyl xanthate, methyl isobutyl carbinol, borax, silica sand, sodium nitrate and sodium carbonate.</p>



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#	COMMENT	RESPONSE
54	Need for information on any plans for the processing plant to process ore from other nearby deposits, including other deposits owned by the Proponent	The Upper Beaver Gold project proposes to mine and process ore from an onsite underground mine and open pit. The processing plant is a very large capital investment, and will provide employment opportunities to the area. Although not currently identified or planned, there is the potential that the processing plant could also process ore trucked to the site from other compatible deposits owned by Agnico Eagle at the same time as processing the Upper Beaver Gold ore, or potentially after the onsite ore resource is depleted. Development of other ore bodies to feed the Upper Beaver Gold processing plant in the future (if any) will be required to meet all federal and provincial regulatory processes at the time, and accordingly, may require completion of an additional IA process.
55	Need for further information on methods for transportation of ore on-site to the processing plant, and transportation of processed materials and metal concentrate to locations off-site	<p>Although not currently identified or planned, there is the potential that the processing plant could also process ore trucked to the site from other compatible deposits. Development of other ore bodies to feed the Upper Beaver Gold processing plant in the future (if any) will be required to meet all federal and provincial regulatory processes at the time, and accordingly, may require completion of an additional IA process.</p> <p>Gold doré bars and copper concentrate that will be periodically shipped off site for sale. There will be very limited transportation of processed materials off site. Due to security concerns details are not available at this time regarding gold doré bar shipment, but it is anticipated to occur infrequently, potential once per week. There will be one to two trucks per day transporting copper concentrate to a purification / refining facility in Québec over the existing Ontario / Québec highway infrastructure. No shipment of product by rail is proposed.</p>
56	Need for further information on how waste will be handled, including information on the transportation of waste off-site and the potential routes that will be used, and the potential requirement for an on-site demolition landfill during decommissioning	Domestic and special management / hazardous materials resulting from the construction and operation of the Upper Beaver Gold project will be periodically shipped off site to appropriate facilities, including existing landfills that can accept industrial waste and potentially recycling facilities. A temporary waste management area may be established to allow for sorting of wastes prior to transport. Any transport of wastes will utilize the existing regional road network. Agnico Eagle will pursue opportunities, and it is hoped that much of the waste generated through demolition during closure, can be sold for reuse, or recycled as scrap metal. Any remaining wastes will be handled according to environmental regulations at that time, and are expected to be transported to an offsite waste management facility.



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#	COMMENT	RESPONSE
		<p>The establishment of a demolition landfill will be assessed in the IS if an IA is required.</p> <p>Domestic sewage will be treated on site by an appropriately-sized, technically acceptable method, such as a sewage treatment plant. Temporary holding tanks may be used for more remote locations or after the sewage treatment plant is decommissioned. Sewage from the tanks will be treated in the onsite treatment plant or transported off site to an existing facility for disposal.</p>
57	Need for further information on the production, transportation, and storage of explosives, as well as explosion protection and response plans	Explosives storage area(s) will be developed on site in compliance with the <i>Explosives Act</i> , to support underground and open pit mining, as well as potentially for site preparation / diversion construction. Explosives will be prepared by a contractor off site, and delivered to site under their care and control as required. The location of any explosives-related facility on site will follow all federal regulatory guidance, including as related to siting.
58	Need for further information on traffic management near the project site, including how signage will be used to ensure public safety from mine vehicles	<p>There is an existing site access by means of Beaverhouse Road which connects to the Trans Canada Highway (Route 66) at two locations via Dobie Road. There are no residences along Beaverhouse Road or Dobie Road. The south access to the Trans Canada Highway is located on the McBean Property and is on private land owned by Agnico Eagle. Agnico Eagle will assess the potential traffic volumes from the Upper Beaver Gold project and describe proposed measures for traffic management as part of the IS, if an IA is required. Preliminary traffic information is provided in Section C.3.4 of the DPD.</p> <p>At the Upper Beaver site, a new access will be provided at the project site for the limited number of cottagers that use the existing road to access their properties so that local traffic will not travel through the secure area of the mine development. This access will be separate roads used by mine vehicles.</p>
59	Need for further information on impacts to public tax funded roads from mine vehicles	Agnico Eagle will assess the potential traffic volumes from the Upper Beaver Gold project in discussion with the Ministry of Transportation and local Townships, to assess any requirements associated with use of existing roads. Required taxes will be paid to applicable levels of government.



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#	COMMENT	RESPONSE
INDIGENOUS AND PUBLIC ENGAGEMENT		
60	Engagement activities must be respectful of Indigenous protocols and knowledge. Notification of engagement activities must be provided in advance to ensure Indigenous groups have adequate time to coordinate activities with community members	<p>Agnico Eagle has been engaging with Indigenous Nations and will continue to engage following the community-specific protocols and expectations, promoting advanced notification and time for participation through culturally appropriate means.</p> <p>Agnico Eagle agrees and notification has been and will continue to be provided in advance as much as reasonable, recognizing that there could potentially be regulatory time constraints associated with some engagement activities.</p> <p>Through our Indigenous People Engagement Policy, Agnico Eagle is committed to work in partnership with Indigenous Peoples to establish a mutually, beneficial, cooperative and productive relationship. Our approach is characterized by effective two-way communication, consultation and partnering. We are seeking to inform Indigenous communities and consult them on the likely impacts and potential opportunities arising from our activities.</p>
61	Need for information on the Proponent's future efforts to engage with Indigenous groups, including opportunities to meet with technical experts and review technical materials	Agnico Eagle is committed to meaningful engage and involve Indigenous Nations throughout the Project, including opportunities to meet with technical experts and review technical materials. Agnico Eagle has provided and will continue to provide opportunities and support for participation in field activities. Agnico Eagle will develop an Engagement Plan with Indigenous Nations to guide these activities.
62	Need for further information on future efforts to engage Indigenous groups and the public, given the ongoing COVID-19 pandemic and restrictions on in-person gatherings	The pandemic has reinforced the importance of building inclusive and trusting relationships with our local communities and Indigenous Peoples. Agnico has adapted through virtual engagement working collaboratively with Indigenous Nations. Additionally, Agnico Eagle has created numerous opportunities to regularly inform communities and Indigenous Nations about our project, while providing them with the opportunity to interact directly with our project team. Agnico Eagle will continue to listen to Indigenous Nations and local communities about how best to engage in a safe and effective manner.
63	Need for further information on efforts to engage with and seek input from the local population, including nearby property owners in and around the Beaverhouse Lake and Misema river system, and downstream stakeholders with regional interests. Recommend open-house events in the communities of Dobie, Larder Lake, King Kirkland, and Virginiatown	Agnico Eagle will conduct research to inform baseline studies with Indigenous Nations, local communities and land and resource users. Agnico Eagle will produce an inclusive Engagement Plan for 2022 and will evaluate the option of holding open-house events; however, Agnico Eagle wishes to make sure engagement activities will be suitable for comments documentation, to be able to address them properly.



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#	COMMENT	RESPONSE
64	Provide a list of all stakeholders that are being (or will be) engaged, such as federal departments, provincial ministries, Indigenous groups, and the general public	A list of all stakeholders and Indigenous Nations will be provided in the IS if an IA is required, updated from the list provided in the IPD.
INDIGENOUS PARTICIPATION OPPORTUNITIES		
65	Need for further information on funding opportunities by the Proponent for Indigenous groups to participate in project activities	Agnico Eagle is engaging with each identified local Indigenous Nation to outline the support required to participate in the IA process, should an IA be required.
66	Need to describe opportunities for Indigenous participation in collection and validation of environmental baseline data, including the Proponent's studies on wetland characterization, species at risk, migratory birds, wildlife, fish and fish habitat (including fish tissue sampling), water quality and water quantity, and archaeological studies	<p>Agnico Eagle and previous owners, have conducted environmental baseline investigations since 2011 for the Advanced Exploration permitting. For many years, following from a request from the community, a field worker from Beaverhouse First Nation often participate in field work with our technical professionals.</p> <p>Agnico Eagle recently completed additional work to fill gaps identified in the existing information, in anticipation of Impact Assessment requirements. In preparation for this work, Agnico Eagle had met with the five local Indigenous Nations that Agnico Eagle and the previous owned have engaged with on the Upper Beaver site for over 10 years, to inform about the baseline coming field work. Opportunities for participation were presented in advance, so Indigenous Nations could know and share their interest in advanced. Prior field work, Agnico Eagle reached out several times to Beaverhouse First Nation, Wahgoshig First Nation, Matachewan First Nation, Timiskaming First Nation and the Métis Nation of Ontario to inform them about the proposed work and to determine if there was interest in participating or observing, a number of the environmental baseline investigations during 2021 (see DPD Sections D.7.4 and D.7.5).</p> <p>Several members of the involved Indigenous Nations have been participating in field activities to date (water sampling, terrestrial resources, hydrology, aquatic resources and archaeology). Indigenous Nations have previously been invited and will continue to be invited to participate in field activities.</p> <p>Results of this work will be presented to the Indigenous Nations so they can comment and give their feedback.</p>
67	Request to participate in the Proponent's studies on impacts to country foods and contamination to country foods due to the Project, as well as in a Human Health Risk Assessment	Indigenous Nations have been invited and will continue to be invited to participate in the country foods study in support of the Human Health and Ecological Risk Assessment to be completed in support of the IS, if an IA is required.



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#	COMMENT	RESPONSE
68	Need to describe opportunities for Indigenous participation in development of the mine plan, including wastewater management and the selection of the effluent discharge location, to ensure that Indigenous knowledge is considered	Agnico Eagle have invited and will continue to invite Indigenous Nations to participate in information and planning sessions to inform the mine plan that creates opportunities to understand and value Indigenous Knowledge in refining Project planning as applicable.
69	Need to describe opportunities for Indigenous participation in development of mitigation measures, monitoring plans and management plans, including water and wastewater management plans, waste rock management plans, decommissioning and closure plans, remediation of historical mine contamination, and the land use plan for the site post decommissioning phase, to ensure that Indigenous knowledge is considered	Agnico Eagle will invite Indigenous Nations to participate in information and planning sessions to inform the development of management, mitigation and monitoring approaches that creates opportunities to understand and value Indigenous Knowledge in refining Project planning.
70	Need for separate, Indigenous group-specific, Traditional Land and Resource Use (TKLU) studies, which includes a Métis-specific TKLU study, which is validated by Indigenous groups and incorporates knowledge from community Elders	Agnico Eagle is collaborating with each local Indigenous Nation to outline and support the development of Indigenous Knowledge studies (inclusive of land and resource use). Agnico Eagle will work with each Indigenous Nation to understand, incorporate and validate how this knowledge was used, informed and is presented in the IS, as appropriate.
71	Information on existing agreements between the Proponent and certain Indigenous groups in the Initial Project Description is not accurate	Upon reading the detailed comments, we understand that one of the communities actually required that more information be provided regarding the signatories of the exploration agreements. As per the IPD, Agnico Eagle has agreements for exploration and/or consultation activities, signed with four of the five local Indigenous Nations. Those Indigenous Nations are: Beaverhouse First Nation, December 2014; Matachewan First Nation / Wahgoshig First Nation, July 2015; and Timiskaming First Nation, May 2018
INDIGENOUS PEOPLES' CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES		
72	Potential effects on current and future use of lands such as for fishing, hunting, harvesting and gathering, teaching, and knowledge sharing; resources; and access to sites of cultural significance, such as hunting areas located near the tailings storage facility	Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects in the IS, if an IA is required.



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#	COMMENT	RESPONSE
73	Potential effects on current use of lands upstream and downstream from the Project due to the water diversion channels and changes in surface water quality	<p>Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects.</p> <p>There are no anticipated changes to lands or land use upstream of the project site, including related to changes in surface water quality.</p> <p>Small diversion channels will divert the Misema River system around York Lake. This affects a very small area, and will purposefully avoid archaeological sites.</p> <p>Effluent is proposed to be discharged to the Misema River downstream of the project site. The effluent will be required to meet all regulatory requirements. There is no expected changes to land use downstream of the project.</p>
74	Potential impacts on fishing, hunting, harvesting and gathering from increase in human population due to proposed mine development	<p>The Upper Beaver Gold project is located in historic mine district which has had an overall population decline. Over the past 35 years, the population has declined by more than one-third from 12,000 in 1986. The project is not expected to result in a large change in regional or local population but may contribute to modest growth in the existing population within commuting distance from the site. No material impact to fishing, hunting, harvesting and gathering from a modest increase in human population due to proposed mine development is expected.</p>
75	Potential effects on fishing due to contamination to fish in Beaverhouse Lake and downstream of proposed effluent discharge locations	<p>Agnico Eagle is collaborating with each local Indigenous Nation to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects in the IS, if an IA is required.</p> <p>There will be no discharges from the Upper Beaver Gold project to Beaverhouse Lake. The aquatics resources baseline study currently in preparation will document the existing concentration of parameters of concern in fish within Beaverhouse Lake (and other local watercourses / waterbodies). Similarly, the surface water baseline will document the existing concentration of parameters of concern in Beaverhouse Lake (and other local watercourses / waterbodies).</p> <p>Effluent from the mine will need to all regulatory requirements prior to discharge, including the Metal and Diamond Mining Effluent Regulations (MDMER). Studies will be completed as part of the IS if an IA is required, to determine if there will be a potential effect on fish from the effluent release.</p>



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#	COMMENT	RESPONSE
76	Potential effects on the ability to hunt and trap animals, such as moose, due to wildlife disturbance from noise and habitat degradation	<p>Agnico Eagle is collaborating with each local Indigenous Nation to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects.</p> <p>Agnico Eagle intends to continue work with its neighbours to mitigate potential localized effects during operation. Hunting will continue to be restricted on the project site in order to ensure the safety of workers and others. Apart from the transmission line, there is no expected clearing of lands / removal of terrestrial habitat off site.</p> <p>There is the potential for some avoidance of the area near the site by wildlife due to noise effects; however, it is not anticipated that for species such as moose and furbearers including beaver, otter, wolf or marten that significant avoidance of the site due to noise would occur.</p>
77	Need for further information on medicinal and culturally significant plants and their habitat within the project and regional areas	<p>Agnico Eagle hopes to be able to work with local Indigenous Nations to help document this information, so that it can be used in assessing potential effects from the Upper Beaver Gold project and developing appropriate mitigation strategies. Information shared will be utilized to inform the IS, if an IA is required.</p>
78	Need for further information on the sites of cultural significance in the project area, including measures to mitigate potential effects on these sites	<p>Agnico Eagle is collaborating with each local Indigenous Nation to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects. Agnico Eagle will engage with each Indigenous Nation to support the development of appropriate mitigation and monitoring measures.</p> <p>Archaeological studies have been conducted and no cultural heritage features or artefacts have been identified in locations of proposed development. This will continue to be reviewed as the project's designs and progress, including relation to the diversion of the Misema River, and mitigation will be completed, if needed. Measures will be put in place to identify any as yet undetected features or artefacts during construction.</p> <p>Copies of archaeological studies completed will be shared with the IS, if an IA is required.</p>



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#	COMMENT	RESPONSE
79	Need for further information on potential effects on navigation on all navigable waterways during all project phases, including proposed mitigation measures	<p>Agnico Eagle is collaborating with each local Indigenous Nation to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects. Agnico Eagle will engage with each Indigenous Nation to support the development of appropriate mitigation and monitoring measures.</p> <p>In-water structures will be designed to avoid interference with navigation as reasonable. Potential impediments to navigation include:</p> <ul style="list-style-type: none"> - Ava Lake water intake - Misema River effluent discharge - Upgrades to existing culverts at road crossings (one or two) - New watercourse crossings (three or more) - Dykes installed to isolate York Lake <p>Creation of diversion channels may improve local navigability.</p> <p>Further information regarding potential effects to navigation will be provided in the IS, if an IA required.</p>
80	The list of communities that are signatories to the Treaties in the project area described in the Initial Project Description should be revised and updated	<p>The Kirkland Lake area including Gauthier Township where the project is located, are included in the territory of the Robinson Huron Treaty (1850). None of the five indigenous Nation that Agnico Eagle have been engaging with for the past years for the Upper Beaver Gold project have signed this Treaty. However, the territory of each of the five Indigenous Nations are overlapping those of Treaty 9 and of the Robinson-Huron Treaty. Matachewan and Wahgoshig have signed Treaty 9 in 1906, while Timiskaming First Nation, Beaverhouse First Nation and Métis Nation of Ontario have not signed any of the treaties of the federal Government.</p>
INDIGENOUS PEOPLES' EXERCISE OF ABORIGINAL AND/OR TREATY RIGHTS		
81	Potential adverse impacts on fishing practices due to the destruction of culturally important fish species and their habitat, including contamination of water quality and changes in water flows	<p>There are no expected adverse impact to fishing impacts due to either destruction of fish species, contamination of water or changes in water flows. Fish will be removed from watercourses / waterbodies prior to isolation, as needed.</p> <p>There will be a loss of fisheries habitat associated with the Upper Beaver Gold project, including York Lake which will be mitigated, including through establishment of fish habitat compensation and offsetting measures.</p>



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#	COMMENT	RESPONSE
		Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects. These aspects will be described in the IS, if an IA is required.
82	Potential adverse impacts on hunting practices due to effects on culturally important wildlife species, such as moose	<p>Agnico Eagle intends to continue work with its neighbours to mitigate potential localized effects during operation. Hunting will continue to be restricted on the project site in order to ensure the safety of workers and others.</p> <p>Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects in the IS, if an IA is required.</p>
83	Potential impacts on the effectiveness of hunters and gathers through the loss of ecological knowledge from loss of access to preferred harvesting areas	<p>Agnico Eagle intends to continue work with its neighbours to mitigate potential localized effects. Harvesting will continue to be restricted on the project site in order to ensure the safety of workers.</p> <p>Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects in the IS, if an IA is required.</p>
84	Potential adverse impacts on sensitive cultural sites and areas identified by Indigenous groups	Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform the evaluation of potential effects in the IS, if an IA is required.
INDIGENOUS PEOPLES' HEALTH AND WELL-BEING		
85	Need for information on potential bioaccumulation of contaminants in country foods due to uptake from air, water and soils, and associated impacts on Indigenous peoples' health, including proposed mitigation and monitoring plans	Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform country food studies and the evaluation of potential effects. Agnico Eagle will engage with each Indigenous Nation to support the development of appropriate mitigation and monitoring measures.
86	Potential effects on health, mental health, and well-being as a result of project-related changes to water used for recreational purposes and from a loss of connection to the land	Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform health and well-being studies and the evaluation of potential effects, that will be documented in the IS if an IA is required.



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#	COMMENT	RESPONSE
87	Need for further information on the potential effects to social determinants of health, proposed mitigation measures and monitoring plans	Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform health and well-being studies and the evaluation of potential effects of the project. Agnico Eagle will engage with each local Indigenous Nation to support the development of appropriate mitigation and monitoring measures.
88	Need for further information on potential effects on food security of Indigenous groups, including proposed mitigation measures and monitoring plans	Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) that will inform health and well-being studies and the evaluation of potential effects of the project related to food security. If applicable, Agnico Eagle will engage with each Indigenous Nation to support the development of appropriate mitigation and monitoring measures.
INDIGENOUS PEOPLES' SOCIAL AND ECONOMIC CONDITIONS		
89	Potential for positive and adverse effects on social and economic conditions of Indigenous groups. Potential positive effects could include opportunities for employment, training and education and adverse effects could include increased cost of living, impact to the local economy, and reduction in land value	<p>Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) and gathering of additional information that will inform socio-economic studies and the evaluation of potential effects of the project. These will be documented in the IS, if an IA is required.</p> <p>Additionally, Agnico Eagle are in discussions with local Indigenous Nations to establish mutually beneficial, cooperative and productive relationships through which they would have access to training and employment opportunities as well as business opportunities. Three exploration agreements are already in place with four local Indigenous Nations, which contain commitments to provide job opportunities and business opportunities; it is expected to be similar for the mining project.</p>
90	Potential effects on the ability to commercially fish and hunt in the area, which is the livelihood of many local Indigenous people	Agnico Eagle is collaborating with local Indigenous Nations to support the development of their Indigenous Knowledge studies (inclusive of land and resource use) and gathering of additional information that will inform socio-economic studies and the evaluation of potential effects on commercial fishing and hunting in the area. This will be documented in the IS, if an IA is required.
91	Need for further information on whether Indigenous peoples and/or businesses in proximity to the Project will receive prioritized employment or business (e.g., procurement or contracting) opportunities	<p>Agnico Eagle is collaborating with local Indigenous Nations to understand their specific interests. Agnico Eagle will engage with each Indigenous Nation to support the development of opportunities for employment and business, as appropriate.</p> <p>Agnico Eagle strives, where feasible, to buy goods and services from locally based suppliers as a way of supporting the economic vitality of our communities, while at</p>



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		<p>the same time reducing the environmental impact of transporting materials and people from distant locations to our sites. We work on engaging with local suppliers for all phases of the mining life cycle. In 2020, 50% of our exploration contracts in Kirkland Lake area were with companies that had joint ventures with First Nations for a total Indigenous procurement spending of approximately \$6 million.</p>
92	<p>Need for further information (e.g., description and quantification) on economic opportunities for Indigenous groups (direct, indirect, and induced)</p>	<p>If an IA is determined to be required, the IS will provide additional information regarding economic benefits of the project, including economic opportunities for local Indigenous Nations.</p> <p>Additionally, Agnico Eagle are in discussions with local Indigenous Nations to establish mutually beneficial, cooperative and productive relationships through which they would have access to training and employment opportunities as well as business opportunities. Three exploration agreements are already in place with four local Indigenous Nations, which contain commitments to provide job opportunities and business opportunities; it is expected to be similar for the mining project.</p>
93	<p>Need for information on the potential for racism towards Indigenous peoples, and associated mitigation measures</p>	<p>Agnico Eagle has established an Indigenous Peoples Engagement Policy which is supported through awareness training. Through the Indigenous Peoples Engagement Policy, Agnico Eagle is committed to meaningful engagement and cooperation, defining capacity-building strategies, and is respectful of Traditional cultures. As well, Agnico Eagle has a Diversity and Inclusion Policy through which they are committed to and recognize the value of a diverse workplace.</p> <p>https://s21.q4cdn.com/374334112/files/doc_downloads/agnico_downloads/policies/2020/SD-Policy-English.pdf</p> <p>https://s21.q4cdn.com/374334112/files/doc_downloads/agnico_downloads/policies/Diversity/EN-2018-Diversity-and-Inclusion-Policy_FINAL.pdf</p> <p>These policies will be integrated as commitments and reinforced through the various project phases. Agnico Eagle has already committed to hold cultural awareness training to employees on a regular basis.</p>
94	<p>Reference the Government of Canada's Community Well-being Index to characterize Indigenous groups</p>	<p>The use of the Community Well-being Index will be reviewed with each local Indigenous Nation to determine its applicability to inform health and well-being studies and the evaluation of potential effects.</p>



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#	COMMENT	RESPONSE
INDIGENOUS PEOPLES' SPIRITUAL, PHYSICAL, AND CULTURAL HERITAGE		
95	Need for further information on cultural heritage environment, including planned, ongoing or completed archaeological assessments	Archaeological studies have been conducted and is still ongoing in two locations close to the project footprint. This will continue to be reviewed as the project's designs and progress, including relation to the diversion of the Misema River, and mitigation will be completed, if needed. Measures will be put in place to identify any as yet undetected features or artefacts during construction. Copies of archaeological studies completed will be shared with the IS, if an IA is required.
96	Potential effects on known sites of spiritual significance near the Project	Agnico Eagle will engage with each local Indigenous Nation on how to document and present information on known sites of spiritual significance publicly (such as in the IS if an IA is required), including defining how effects can be managed and mitigated as required through Project planning.
97	Potential effects on the Indian Trail (referred to as the Traditional Trail in the Initial Project Description), which is one of the main access routes to the area and access to areas of significant cultural value. Recommend building a new access road for the purposes of mining instead of using the Indian Trail	Agnico Eagle will engage with each local Indigenous Nation on how to document and present information on known sites of spiritual significance publicly (such as in the IS if an IA is required), including defining how effects can be managed and mitigated as required through Project planning.
MITIGATION MEASURES AND RESIDUAL EFFECTS		
98	Where potential effects and mitigation measures are proposed, need for characterization of residual effects	If an IA is required, potential effects of the Upper Beaver Gold project will be assessed on the environment and mitigation measures proposed, in order to identify and characterize residual effects using a standardized methodology.
NAVIGATION AND NAVIGABLE WATERS		
99	Need for further information on potential effects on access to Beaverhouse Lake boat launch and Beaverhouse Lake, which provides important access to navigation, during all phases of the Project, including proposed mitigation measures	There is a rudimentary, public boat launch located at the west end of Beaverhouse Lake. Agnico Eagle will ensure that access is retained to Beaverhouse Lake. The current plan is to establish a new, higher quality access route that will avoid the mine site.



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100	Need for further information on potential impacts on all navigable waterways, including Beaverhouse Lake, the Misema River, Howard Lake, Misema Lake, and navigable waters impacted by water crossings (e.g., dams, bridges), during all phases of the Project, including proposed mitigation measures	<p>Agnico Eagle has committed that water levels in Beaverhouse Lake are proposed to be retained at current levels. Any potential indirect effects to Beaverhouse Lake will be fully assessed through the environmental regulatory process.</p> <p>Potential impacts to local watercourses and waterbodies, including with respect to navigability, will be assessed in the IS should an IA be required. There is no potential for impacts to Howard Lake, Misema Lake or other upstream waterbodies will occur. Minor impacts may occur within Beaverhouse Lake associated with water taking and within the Misema River at the discharge location.</p> <p>The proposed diversion from Ava Lake to the Misema River may potentially improve local navigability, as there is currently a steep, natural rapids between Ava Lake and York Lake.</p> <p>Any new or upgraded watercourse crossings will be assessed, and if appropriate, regulatory review and/or approvals obtained in advance.</p>
SOCIAL AND ECONOMIC CONDITIONS		
101	Need for information on potential impacts from influx of project workers overwhelming the capacity of travel corridors and local services, such as healthcare services and the accommodation industry	Through research and engagement, Agnico Eagle will collect information and determine potential impacts from increased traffic and demand on local services associated with the Project. This information will be provided in the IS as appropriate, if an IA is required.
102	Need for further information on baseline economic conditions such as income, unemployment, labour participation, poverty, dependency/reliance on industry, housing statistics, property and land values	Further information will become available through engagement and research activities to inform baseline economic conditions. This information will be provided in the IS as appropriate, if an IA is required.
103	Need for information on economic prosperity and depression cycles regarding mining projects, including proposed mitigation measures to stabilize these cycles for the Project	Agnico Eagle will model the economic environment to consider the cyclical nature of resource industries based on historical prices, and propose measures to react to future price and demand changes and minimize the impact on the operation. As appropriate this information will be used to support the effects assessment in the IS, if an IA is required.
104	Potential for positive impacts on local economies due to employment opportunities	Further information about economic opportunities (employment and business) will be identified through engagement and research activities as well as Project planning. As appropriate this information will be used to support the effects assessment in the IS, if an IA is required.



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105	Potential long-term impacts to economic conditions. Need for the assessment of economic effects to span beyond the mine life, and to consider long-term impacts to communities to ensure long-term community viability	Long-term economic conditions will be identified through engagement and research activities as well as Project planning. As appropriate this information will be used to support the effects assessment in the IS, if an IA is required.
106	Need for further information on potential adverse economic impacts, such as impacts on individual stakeholders, local recreation, tourism and forestry industries, other industries competing for labour, and stresses on government resources	Further information about economic effects will be identified through engagement and research activities as well as Project planning. As appropriate this information will be used to support the effects assessment in the IS, if an IA is required.
107	Need for further information on job availability by project phase	Further information will become available through Project planning and through engagement and research activities that inform baseline studies. As appropriate, this information will be provided in the IS, if an IA is required.
108	Need for further information on the breakdown of jobs by occupation, or otherwise provide any other proxy for skill requirements of the jobs that are to be created	Further information will become available through Project planning and through engagement and research activities that inform baseline studies. As appropriate, this information will be provided in the IS, if an IA is required, potentially based on other mines operated by Agnico Eagle.
109	Need for further information on the breakdown of employment by full-time with benefits versus part-time without benefits, and expected salaries and wages	Further information will become available through Project planning and through engagement and research activities that inform baseline studies.
110	Need for further information on whether underrepresented groups will be considered for training and employment opportunities	<p>Further information will become available through Project planning and through engagement and research activities that inform baseline studies as well as GBA+. Agnico Eagle will engage with diverse populations to inform Project planning and decision-making. As appropriate this information will be used to support the effects assessment in the IS, if an IA is required. Agnico Eagle has a Diversity and Inclusion Policy through which they are committed to and recognize the value of a diverse workplace.</p> <p>https://s21.q4cdn.com/374334112/files/doc_downloads/agnico_downloads/policies/2020/SD-Policy-English.pdf</p> <p>https://s21.q4cdn.com/374334112/files/doc_downloads/agnico_downloads/policies/Diversity/EN-2018-Diversity-and-Inclusion-Policy_FINAL.pdf</p> <p>These policies will be integrated as commitments and reinforced through the various project phases.</p>



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111	Need for further information on how company policies, including on sustainable development and diversity and inclusion, will be applied to the Project to ensure maximization of positive outcomes for local communities	<p>Agnico Eagle aims to act in a socially responsible manner and contribute positively to the communities in and near where it operates. We are committed to working with our employees, other stakeholders and rights holders to create growth and prosperity, allowing everyone to benefit from our mining experience, hence making mining work for all. We believe that responsibly undertaken, gold mining plays an important and positive role in supporting sustainable socio-economic development in communities. We work together with communities to assess potential opportunities to enhance local economic benefits and create economic prosperity beyond the life of mine.</p> <p>Through our Sustainability Development Policy we are committed in contributing to the social and economic development of sustainable communities associated with our operations through measures such as local hiring, local procurement and community investments: https://s21.q4cdn.com/374334112/files/doc_downloads/agnico_downloads/policies/2020/SD-Policy-English.pdf.</p> <p>For the Upper Beaver Gold project, our goal is to maximize the benefits for the local communities, just like we do everywhere else we operate. The Upper Beaver Gold project is expected to create between 400 and 600 jobs and generate economic opportunities and vitality for local businesses. Our goal is to hire 100% of our workforce, including our management teams, directly from the region / country in which each of our operations are located.</p> <p>From a procurement perspective, Agnico Eagle strives, where feasible, to buy goods and services from locally-based suppliers as a way of supporting the economic vitality of our communities, while at the same time reducing the environmental impact of transporting materials and people from distant locations to our sites. Local suppliers must meet the same criteria that all potential suppliers must meet in order to do business with our Company. Approximately 70% of the spending of our Canadian operations is done locally, in their respective region. As for community investments, the surrounding communities of the Upper Beaver Gold project will be included in our community investment program.</p>



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		<p>Agnico Eagle are also in discussions with local Indigenous Nations to establish mutually beneficial, cooperative and productive relationships through which they would have access to training and employment opportunities as well as business opportunities.</p> <p>Diversity and inclusion are fundamental to Agnico Eagle’s core values of Family, Trust, Respect, Responsibility and Equality. We are committed to engaging, developing and retaining the best people, and empowering everyone with equal access to opportunities and recognition. We value workforce diversity – which includes under-represented groups, such as women and Indigenous Peoples - and promote the benefits of diversity and inclusion.</p> <p>As such, we have adopted a Diversity and Inclusion Policy that outlines our commitments and responsibilities, which build on the work of our Diversity and Inclusion Council: https://s21.q4cdn.com/374334112/files/doc_downloads/agnico_downloads/policies/Diversity/EN-2018-Diversity-and-Inclusion-Policy_FINAL.pdf</p> <p>Our diversity and inclusion action plan focuses on understanding the composition of our communities, how our employees self-identify, existing and perceived barriers and best practices; opening eyes with information and awareness training; opening doors by providing opportunities for education, training and jobs; partnering for success with industry associations, suppliers and interested groups.</p>
112	Need for further information on whether diversity and inclusion will be supported through the training and hiring strategy, and in the procurement/contracting strategy	<p>At Agnico Eagle, we are committed to valuing workplace diversity and inclusion across all aspects of our business. This commitment aligns with our core values of Family, Trust, Respect, Responsibility and Equality and to the United Nations Sustainable Development Goal No 5 – Gender Equality. This commitment is also reflected in our Sustainable Development Policy: https://s21.q4cdn.com/374334112/files/doc_downloads/agnico_downloads/policies/2020/SD-Policy-English.pdf, and our Code of Business Conduct and Ethics.</p> <p>We are committed to engaging, developing, and retaining the best people and empowering everyone with equal access to opportunities and recognition. As such, we have adopted a Diversity and Inclusion Policy that outlines our commitments and responsibilities, which build on the work of our Diversity and Inclusion Council. The</p>



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		<p>Council, which was established in 2019, has identified six key pillars of diversity in the way we treat people within our organization: Recruitment, Orientation, Retention, Compensation, Training and Development.</p> <p>For all our operations and projects, we strive to achieve a level of diversity from the mine face to the senior leadership team reflective of our host communities. We are guided in our efforts by our Diversity and Inclusion Council which continues to build upon an action plan that is focused on: understanding the reality of our employees, communities and society at large; opening minds with information and awareness training; opening doors by providing opportunities for education, training and jobs; and partnering for success with, industry associations, suppliers and interested groups.</p> <p>Additionally, we are in discussions with Indigenous groups concerned by the Project to establish mutually beneficial, cooperative and productive relationships through which they would have access to training and employment opportunities as well as business opportunities.</p>
113	Need for further information on proposed plans for draining York Lake, including additional information on the social and economic effects related to this activity	There are no expected social or economic effects related to this activity. Agnico Eagle will share information on the proposed plans for York Lake to understand potential impacts to social and economic environments and inform the IS, if an IA is required.
SPECIES AT RISK, WILDLIFE, AND THEIR HABITAT		
114	Need for additional baseline studies on terrestrial wildlife, species at risk, and migratory birds (including updated breeding bird surveys and fall migratory bird surveys)	A comprehensive terrestrial field program was conducted in 2021 with surveys for plants, amphibians, reptiles, raptors, breeding birds and mammals, including bats, moose and furbearers including wolves, marten and beaver. Surveys included Species at Risk using appropriate protocols. Data from 2021 surveys is currently being analyzed for summary in baseline report. If data gaps are identified, additional studies will be considered in 2022. A brief summary of the 2021 results is provided in the DPD (Section D.7).
115	Potential effects on the movement, reproductive success and habitat of wildlife, such as loons, ducks, blue herons, moose, black bears, lynx, bald eagles, ospreys, turkey vultures, barn owls, hoot owls, nighthawks, falcons, mice, rabbits, squirrels, and chipmunks	A comprehensive terrestrial field program was conducted in 2021 with surveys for plants, amphibians, reptiles, raptors, breeding birds and mammals, including bats, moose and furbearers including wolves, marten and beaver. Surveys included Species at Risk using appropriate protocols. Data from 2021 surveys is currently being analyzed for summary in baseline report. If data gaps are identified, additional studies will be considered in 2022.



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116	Potential effects on terrestrial wildlife, including migratory birds and species at risk, from Project activities such as deforestation and land-use changes, habitat fragmentation from construction of linear infrastructure such as the transmission line, roads, and the water diversion channels, and associated effects on local biodiversity and species of cultural value	Landscape effects from Project impacts and cumulative disturbance effects on migratory birds, terrestrial wildlife and Species at Risk will be described in the IS, if an IA is required.
117	Potential effects on aquatic wildlife, such as amphibians, from dewatering of York Lake and the construction and operation of dams and diversion channels	Potential effects on wildlife including amphibians will be described in the IS, if an IA is required, including any potential effects from dewatering.
118	Concern about the release of air quality contaminants from mining operations, such as dust from the tailings and metals, and associated effects on wildlife and their habitat	Monitoring for the mine operations phase can include air monitoring for dust and any potential pathways for impacts to wildlife or their habitat.
119	Potential effects on wildlife from increased noise levels and light pollution, including proposed mitigation measures	Potential effects on wildlife from noise and light pollution will be fully considered in the IS, if an IA is required. Mitigation measures to reduce any predicted impacts will be included as appropriate.
120	Need for further information on proposed plans for draining York Lake, including additional information on the impacts to terrestrial wildlife and their habitat from this activity, and proposed mitigation measures	Landscape effects from Project impacts and cumulative disturbance effects on migratory birds, terrestrial wildlife and Species at Risk will be included in the in the IS, if an IA is required for the Project. Mitigation measures to reduce any predicted impacts will be included as appropriate.
121	Clarity on the specific timing windows being considered to avoid or mitigate potential effects to breeding birds from project construction and tree clearing	Timing windows to mitigate potential impacts to breeding birds from construction will encompass April 1 to August 31.
122	Need for further information on mitigation measures for potential effects to species at risk	Mitigation measures for Species at Risk will include timing windows, minimization of habitat disturbance, monitoring and habitat compensation where needed to meet authorization requirements under the <i>Endangered Species Act</i> , if any.
SUSTAINABILITY		
123	Need for further information on the Project's over-all contribution to environmental, social, health, and economic sustainability	<p>Agnico Eagle believes that responsibly undertaken, gold mining plays an important and positive role in supporting sustainable socio-economic development in communities. We are committed in contributing to the social and economic development of sustainable communities associated with our operations.</p> <p>Agnico Eagle believes that the Upper Beaver Gold project (and the Kirkland Lake properties) may have the potential, and importantly could be core, for developing a new mining platform and creating a long-term economic benefit to the region and the communities. Mining is a major economic driver for the Province of Ontario and</p>



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		<p>Canada. It provides a large number of direct jobs and indirect employment. The Upper Beaver Gold project is expected to have a positive effect on the local and regional economy. Up to approximately 400 to 600 permanent jobs are anticipated from the project, as well as many contracts for qualified contractors in the region. Training and work experience are expected to result in capabilities that are transferable to other economic sectors for residents and contractors.</p> <p>From a procurement perspective, Agnico Eagle strives, where feasible, to buy goods and services from locally-based suppliers as a way of supporting the economic vitality of our communities, while at the same time reducing the environmental impact of transporting materials and people from distant locations to our sites.</p> <p>As for community investments, the surrounding communities of the Upper Beaver Gold project will be included in our community investment program. Our community investment program targets initiatives that enable each of the communities where we operate to benefit from economic development in their region, even after mining ceases. Our goal is to provide both Agnico Eagle and our host communities with optimum return on our investments in strategic health, education and capacity-building initiatives. Since 2009, Agnico Eagle’s community investments have totaled over \$52 million. In 2020 alone, the Company contributed over \$5 million to various local organizations and events. Most funds went to economic development initiatives (26%), health (24%), and promotion and sponsorships (18%).</p> <p>We are also in discussions with local Indigenous Nations to establish mutually beneficial, cooperative and productive relationships through which they would have access to training and employment opportunities as well as business opportunities.</p> <p>In terms of environmental sustainability, the Upper Beaver Gold project would provide the opportunity to rehabilitate legacy sites, including historic tailings and mine rock located in, and beside, York Lake. Historically the Upper Beaver Mine was advanced at two locations: on the east and west shores of York Lake (referred to as the Upper Beaver East and Upper Beaver West Mines). In these two areas, there are historic openings at surface (shaft and raise), mining stopes close to surface, mine rock and tailings in the shore and the littoral areas of York Lake, and concrete foundations. Over the last years, some rehabilitation and investigation work has</p>



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		<p>been conducted on the property. As part of the proposed future activities, Agnico Eagle will continue to rehabilitate these historical mine hazards in accordance with the Rehabilitation Code of Ontario, including with the proposed open pit, where there is an opportunity to permanently remove some of these legacy issues.</p>
124	<p>Need for further information on how the Proponent's company policy on sustainability will be applied to company activities</p>	<p>Throughout our 64 years in business, Agnico Eagle have built a strong culture of responsible behaviour, achieving high standards of sustainability performance with a long-term goal of distinguishing ourselves as responsible miners. We have earned our reputation as a partner of choice within the industry by operating with respect for others, building trust, being reliable, sharing opportunities and bringing prosperity to our employees, their families and the communities in which we operate.</p> <p>Agnico Eagle integrates sustainable development considerations into its business strategy as well as in the way it plan and manage its activities. It is fundamental to all phases of our operations from exploration to reclamation. We assess potential impacts and risks associated with our activities across the whole lifecycle of our projects and operations.</p> <p>Our Sustainable Development Policy which can be viewed at the following website: (https://www.agnicoeagle.com/English/sustainability/our-approach-and-commitments/default.aspx) highlights our commitment to health and wellness, to the protection of Human Rights, and to minimize risks associated with the management of tailings and water. At the core of our Policy, we are committed to creating value for our shareholders while operating in a safe, socially and environmentally responsible manner, contributing to the prosperity of our employees, their families, the communities and respecting human rights, cultures, customs and values of those impacted by our activities. This translates into four fundamental objectives: operate safely, maintain a healthy workplace, protect the environment, and treat our employees and communities with respect.</p> <p>We are committed to implementing standards developed through international initiatives, principles, codes and programs to which Agnico Eagle is a signatory. As such, we have implemented the Mining Association of Canada's Towards Sustainable Mining initiatives at our operating mines. This initiative promotes best practices in environmental protection, biodiversity, energy efficiency, water stewardship, tailings</p>



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		<p>management, community engagement and Indigenous relations, safety and transparency.</p> <p>Other standards which guide our activities include the International Cyanide Management Code, the Conflict-Free Gold Standard, the Voluntary Principles on Security and Human Rights, and the United Nations Sustainable Development Goals. Additionally, as a member of the World Gold Council. Agnico Eagle has also committed to implement the Responsible Gold Mining Principles by the end of 2022. We have also implemented governance, disclosure and reporting structures and guidelines to ensure good oversight, transparency, accountability and sustainability, measure ourselves and help uphold our core values in an ethically responsible manner.</p> <p>We have implemented our Risk Management and Monitoring System (RMMS) as the foundation for managing the commitments made in our Sustainable Development Policy and under the international initiatives, principles, codes, and programs to which we are a signatory.</p>
125	Need for further information on how the Proponent will ensure environmental resources are sustained over the long term (i.e., the seven generations principle of sustainability)	<p>At Agnico Eagle, we strive to work together for a sustainable future. Throughout our 64 years in business we have consistently created value for our shareholders, while striving to improve employee conditions and making a significant contribution to our communities. We have built a strong culture of responsible behaviour, achieving high standards of sustainability performance with a long-term goal of distinguishing ourselves as responsible miners. Agnico Eagle's is committed in building a great long-term business, one that generates superior returns while remaining committed to our core values of trust, respect, equality, family and responsibility. Our strategy is to build long-term mining platforms.</p> <p>Sustainability is a mindset and we see it as an opportunity to do better, to constantly improve and to deliver on our responsibilities and promises to our stakeholders. We believe that responsibly undertaken, gold mining plays an important and positive role in supporting sustainable socio-economic development in communities. With a culture of respect and trust, stakeholders become partners with whom you want to develop long-term relationships. We work together with communities to assess potential opportunities to enhance local economic benefits and create economic prosperity beyond the life of mine.</p>



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		<p>Properly managing and mitigating environmental risk is critical to protecting the environment, as well as human health, and thus maintaining the sustainability of our business.</p> <p>Agnico Eagle is dedicated to supporting biodiversity and integrating conservation actions into our planning and operations. Careful land use planning, done in consultation with local communities, allows us to identify critical habitat and species, and put forward initiatives to monitor, study, protect and support the sustainability of ecosystems. Additionally, we are committed to rehabilitating our sites to ensure long-term physical and chemical stability, in consultation with nearby communities and in a timely manner. Successful closure and reclamation ensure a sustainable environment and economy for our host communities. As an example, at our Pinos Altos mine in Mexico, we have made the sustainable integration of bees a key element of our restoration and conservation activities, which form part of our mine closure plans. By doing so, we are helping preserve natural habitat for these important pollinators. We are also creating opportunities for agri-food initiatives and sustainable economic development in the region by teaching beekeeping to community members.</p> <p>Moreover, Agnico Eagle has ongoing partnerships with research institutes such as the Research Institute on Mines and Environment UQAT-Polytechnique. Focused on the environment, this unique research program is providing leading-edge research on environmental challenges that face the global mining industry, such as climate change and tailings management. Much of this work is accomplished while also training highly qualified personnel who represent the workforce of tomorrow.</p>
TRANSBOUNDARY EFFECTS		
126	Potential for transboundary environmental, social, and economic effects between the provinces of Ontario and Quebec	<p>There are no facilities planned in the Québec. No transboundary negative impacts from the Upper Beaver Gold project are anticipated. The project is not expected to result in changes to the natural and biophysical environment outside of Ontario, as will be confirmed through future modelling. The air quality assessment will evaluate potential transboundary impacts on ambient air quality, based on proximity of the Upper Beaver Gold project to the Ontario – Québec border.</p> <p>Based on proximity of the Upper Beaver Gold project to the Ontario – Québec border, it is expected that some workers and contractors may travel to the site from</p>



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		Québec, and not just from Ontario. In addition, there will be one to two trucks per day transporting copper concentrate to a purification / refining facility in Québec over the existing Ontario / Québec highway infrastructure.
127	Need for further information on the intended use of the inter-provincial rail line between Quebec and Ontario	Agnico Eagle does not plan to use of the inter-provincial rail line for the Upper Beaver Gold project (see DPD Section F.2).
USE OF LANDS AND RESOURCES		
128	Potential effect on access to private properties if currently used access roads are closed for mining activities	A new access will be provided at the project site for the limited number of cottagers that use the existing road to access their properties so that local traffic will not travel through the secure area of the mine development (see DPD Section C.3.4).
129	Potential degradation of the experience of using Beaverhouse Lake and the Misema River system	Experience will be discussed so that an understanding of the potential impacts to experience can be documented, assessed and that management and monitoring measures can be proposed. These will be outlined in the IS if an IA is required, as appropriate.
130	Potential degradation of the experience of lands and resources due to light pollution, noise and vibration from the Project, such as at nearby residences and areas used for hunting, fishing and gathering	Experience will be discussed so that an understanding of the potential impacts to experience can be documented, assessed and that management and monitoring measures can be proposed. These will be outlined in the IS if an IA is required, as appropriate.
VULNERABLE POPULATION GROUPS (GBA+)		
131	Need for social and economic information to be disaggregated by identity factors (such as by gender or age group) to identify gaps or inequities among diverse groups of the population	This information will be captured through research and engagement activities to understand the perspectives and experiences of diverse groups of the population. This information will be used to inform the IS if an IA is required, as appropriate.
132	Need for more information on how an Indigenous-focused GBA+ lens is applied to the Project	Through engagement with each local Indigenous Nation an approach to gathering GBA+ information and applying to the project will be co-defined. This information will be used to inform the IS if an IA is required, as appropriate.
133	Clarity on potential issues of gender based violence, such as sexual harassment, violence against women, human trafficking, and means to avoid or mitigate potential issues, including any policies or information on external interactions with Indigenous peoples in or around the Project, including potential for differential effects on women	<p>Specific issues and nuances of recurrent themes of gender-based violence will be co-defined through research and engagement with Indigenous Peoples and local communities. This information will be used to inform the IS if an IA is required, as appropriate.</p> <p>Agnico Eagle conducts business in regions where human rights laws are respected and promoted, and we are committed to upholding fundamental human rights as defined in the United Nations Universal Declaration of Human Rights. This includes providing assurance that our operations will not support, benefit or contribute to unlawful armed conflict, human rights abuses, or breaches of international humanitarian law. We report on overall implementation of these matters through the</p>



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		Mining Association of Canada's <i>Towards Sustainable Mining</i> annual progress report, the <i>Voluntary Principles on Security and Human Rights</i> annual report and the World Gold Council <i>Conflict-Free Gold Assurance Report</i> . Agnico Eagle began adopting the <i>Voluntary Principles on Security and Human Rights</i> in 2016. These standards aim to help extractive sector companies balance their obligation to respect human rights while protecting the assets and people at their operations.
WATER - SURFACE WATER OR GROUNDWATER		
134	Need for updated surface water baseline studies, including water quality and hydrology	Baseline surface water (water quality, hydrology) investigations have been ongoing in area since 2011, and have intensified in the last few years. Surface water quality monitoring in 2021 includes sampling within the Beaverhouse Lake, Misema River, York Lake, Victoria Creek, Victoria River, as well as smaller local area tributaries and streams. The baseline studies will document the existing conditions of local watercourses / waterbodies, including water quality and hydrology. This information will be used to inform the IS if an IA is required, as appropriate.
135	Need for updated baseline hydrogeological studies, including water levels, groundwater flow directions, hydraulic conductivities and groundwater quality in the overburden, shallow and deeper bedrock	These aspects are included in the baseline studies that are ongoing. Applicable information will be included and assessed in the IS if an IA is required.
136	Need for updated sediment baseline studies in the waterbodies where mining effluent will be deposited	Sediment investigations were completed as part of the aquatic resources baseline studies during 2021 (and previously), including in the Misema River downstream of the site (see DPD Section D.7.5). This information will be used to support future assessment of effects of the Project, as applicable.
137	Potential effects to surface water and groundwater due to acid rock drainage, metal leaching and seepage from the tailings storage facility, waste rock stockpiles, ore stockpiles, and overburden stockpiles. Need for mitigation measures and monitoring plans	Baseline investigations have been completed / are ongoing with respect to surface water and groundwater quality, hydrology and hydrogeology. Geochemistry investigations have also been completed in the past for the advanced exploration program, and have been expanded to consider mine wastes (overburden, mine rock and tailings) from the mine (see DPD Section D.7.2). Potential effects to surface water and groundwater associated with Project facilities and activities will be assessed in the IS if an IA is required, including with the use of predictive models as appropriate. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.



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138	Potential effects on surface water quality and downstream flow from overprinting of waterways and minor creeks by stockpiles and mine infrastructure, and following reconnection of the Pit Lake to the Misema River during decommissioning and reclamation. Need for mitigation measures and monitoring plans	Potential effects to surface water quality and flows associated with Project facilities and activities will be assessed in the IS if an IA is required, including with the use of predictive models as appropriate. Local changes to watershed areas and minor creeks are expected, but not to the overall flow within Misema River upstream or more than a short distance downstream of the site. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.
139	Need for further information on effects on surface water quality and quantity in the project watershed and downstream of the Project, such as to the Grassy Lake Outwash Conservation Reserve, Lake Temiskaming, and the municipality of Temiskaming Shores. Clarify if any other provincial parks or conservation reserves are located within the project watershed. Need for mitigation measures and monitoring plans	Regulatory requirements for effluent discharge quality and changes to flow regimes are strict in Ontario. Baseline investigations have been completed / are ongoing with respect to surface water quality upstream and within a reasonable downstream of the Project site where effects could occur, or for comparison purposes. The watershed boundary for the Project is presented in IPD Figure C.3 (Watershed Boundary) and in the IPD (Figure D.3); the Grassy Lake Outwash Conservation Reserve, Lake Temiskaming, and the municipality of Temiskaming Shores are not located within the Project watershed boundary. The Project is located immediately adjacent to three small lakes which are inline with the Misema River. Ultimately the Misema River flows south into the Blanche River, which drains into Lake Timiskaming, and further south to the Ottawa River and St. Lawrence.
140	Potential effects on surface water levels, including flooding, upstream of the diversion channels, and nearby surface water features. Need for mitigation measures and monitoring plans	There may be some localized changes as a result of changes to watershed areas during operations, due to the need to collect (and treat as necessary) contact. Agnico Eagle has committed that water levels in Beaverhouse Lake will be retained at within current levels, inclusive of natural fluctuations and flooding (per Table F.4 of the DPD). Minor impacts may occur within Beaverhouse Lake associated with water taking and within the Misema River at the discharge location. Potential impacts to local watercourses and waterbodies, including with respect to water levels and flows, will be assessed in the IS should an IA be required.
141	Potential effects of water taking from local waterways, including Ava Lake, and effects on surface water levels	Water takings from watercourses and waterbodies are regulated in Ontario. No discernible effects to Ava Lake levels outside of natural fluctuations are anticipated.
142	Potential effect on groundwater quality due to mine contact water and domestic sewage discharge from the Project. Need for mitigation measures and monitoring plans	Potential effects to groundwater associated with Project facilities and activities will be assessed in the IS if an IA is required, including with the use of predictive models as appropriate. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.



APPENDIX C: RESPONSE TO SUMMARY OF ISSUES

#	COMMENT	RESPONSE
143	Potential effects on groundwater quantity in the vicinity of the site due to dewatering of the open pit and underground workings, resulting in impacts on groundwater users and flows in adjacent surface water bodies. Need for mitigation measures and monitoring plans	<p>Based on published sources and discussions with local individuals, Agnico Eagle understands that that bottled water is used for drinking water, or is water is taken from surface water courses / waterbodies. The closest potable wells are believed to be located in Dobie, Ontario (Ministry of Environment, Conservation and Parks well records). A review of known sources of potable water near the Project footprint will be completed in order to assess potential for effects.</p> <p>Potential effects will be assessed in the IS if an IA is required, or through other regulatory instruments. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.</p>
144	Need for further information on the effects to surface water quality and quantity, and groundwater quality and quantity, from draining York Lake and diverting the Misema River. Need for mitigation measures and monitoring	Potential effects to surface water quality and flows associated with Project facilities and activities, including the draining of York Lake and the diverting of the Misema River will be assessed in the IS if an IA is required, including with the use of predictive models as appropriate. Mitigation measures and an appropriate monitoring program will be established based on the results of the assessment of effects.
145	Need information on how final discharge location(s) are chosen, including any modelling undertaken to select the final location	A treatment plant will be established to ensure that excess water from the site meets all regulatory requirements and can be discharged to the environment. The location has been identified as potentially at the location on the Misema River, where discharge from the Advanced Exploration Project is proposed to occur (see DPD Figure C.1). The discharge location has not as yet been firmly determined, but will be selected once additional information is available, including water quality modelling, to ensure there is sufficient assimilative capacity.
146	Need for further information on the stormwater management strategy and how it may mitigate potential effects on surface water flow, surface water quality and groundwater quality and quantity. Need for mitigation measures and monitoring plans	Effective stormwater management is being considered fully in the project design, including with respect to Engineering Design Flood. Agnico Eagle intends a very high level of water recycle within the project in order to reduce overall effects, including water takings. Stormwater management will be considered as appropriate in the IS if an IA is required, including as a potential mitigation measure. An appropriate monitoring program will be established based on the results of the assessment of effects including residual effects.



APPENDIX C: RESPONSE TO SUMMARY OF ISSUES

#	COMMENT	RESPONSE
147	Need for further information on the Proponent's water management plans for the Project, such as the design for collection ponds and ditches for waste rock stockpiles and ore stockpiles, the type of liners that will be used for the ditching and collection ponds, and further information on wastewater and effluent treatment	A preliminary project design has been presented in the IPD with the intent to inform a decision as to whether or not an IA is required for the Upper Beaver Gold project. Design of the water management for the project is ongoing, with an intent to meet all regulatory requirements. Further information will be provided in the IS if an IA is required, or through other regulatory instruments.
WETLANDS		
148	Potential effects on riparian areas in waterbodies	Effects to riparian areas will be assessed as appropriate in the IS if an IA is required.
149	Need for further information on the potential effects on wetlands, such as changes in availability of rare habitat and loss of ecological functions, during all project phases. Need for mitigation measures and monitoring plans	<p>Wetlands that are potentially impacted by the Project directly or indirectly will be identified within and directly adjacent to the Project footprint. A preliminary map of wetlands / low-lying areas with and near the project footprint based on published information is provided with the DPD (Figure D.5), which will be updated with 2021 field data.</p> <p>Any predicted loss of ecological function during each Project phase will be assessed as part of the IS if an IA is required, and used as inputs into a mitigation and monitoring plan to ensure sustainability and persistence of wetlands on the landscape as needed.</p>

