



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
918 Nunavut Dr  
Iqaluit, NU, X0A 3H0

Your file - Votre référence  
2AM-MEA1530  
Our file - Notre référence  
GCDocs#134513228

March 31, 2025

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC's) Final Submission on the 2024 Modification Request for the Development of a Site-Specific Water Quality Objective for the Meadowbank Gold Mine Projects, Type A Water Licence 2AM-MEA1530.**

Dear Mr. Dwyer,

Thank you for your March 04, 2025, invitation to review Agnico Eagle's second round response to review comments on the 2024 Modification Request for the Development of a Site-Specific Water Quality Objective for Meadowbank Gold Mine Projects for Type A Water Licence 2AM-MEA1530.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed Agnico Eagle's latest responses pursuant to its mandated responsibilities under *the Nunavut Waters and Nunavut Surface Rights Tribunal Act* and *the Department of Crown-Indigenous Relations and Northern Affairs Act*.

CIRNAC maintains that the proposed Site-Specific Water Quality Objective (SSWQO) is relevant only to the closure phase of the Meadowbank Mine and should be considered within the broader closure planning process rather than as a standalone issue. Agnico Eagle itself identified it as a closure planning issue. The quality of water discharged to the environment at closure will depend on multiple factors, including the composition of tailings and reclaimed water, the potential use of in-pit tailings covers, contributions from other sources, and the selection of appropriate water treatment technologies. These elements remain uncertain, and CIRNAC expects that the closure planning process will be used to address them before any modifications to site water quality objectives are considered.

CIRNAC acknowledges that Part E, Item 7 of the Water Licence allows for the development of site-specific water quality objectives, subject to the Nunavut Water Board (NWB) approval. However, CIRNAC remains of the view that site-specific criteria development should be considered only when it has been clearly demonstrated that the closure water quality objectives cannot be met through available mitigation and treatment measures. To date, Agnico Eagle has not provided sufficient information for this option or sufficient justification as the only option to be considered at this early stage in the process. Alternative water treatment technologies should be fully explored and



implemented before considering site-specific criteria that may not align with long-term environmental protection goals.

CIRNAC notes that when in-pit tailings deposition was approved, Agnico Eagle assured regulators that it would not significantly change water quality, quantity, or flow. However, measured TDS concentrations in Goose Pit have exceeded predicted values by an average of 275 percent, contradicting these prior assurances and raising concerns about the reliability of past water quality predictions and the effectiveness of mitigation measures. Given these discrepancies, approving an SSWQO with significantly higher TDS concentrations than originally predicted presents risks to the receiving environment. CIRNAC maintains that site-specific criteria should not be used to adjust regulatory standards in response to unforeseen exceedances. Instead, mitigation and treatment measures should be prioritized to meet closure water quality objectives.

Agnico Eagle has acknowledged that additional data collection—potentially spanning another decade—will be necessary to assess post-closure pit water quality fully. Moreover, based on the most recent water quality forecast presented in the 2023 Annual Report, the TDS concentrations in Portage Pit are projected to gradually reduce as per the existing water management and closure strategy. Given this extended timeline and the ongoing refinement of predictive modelling, any modifications to water quality objectives should be addressed within the Final Closure and Reclamation Plan (FCRP), where all closure-related considerations can be evaluated holistically.

Notably, Agnico Eagle has already initiated discussions and workshops on the draft FCRP with CIRNAC and the Kivalliq Inuit Association. Given this ongoing engagement, it is most appropriate to incorporate the development of the SSWQO within that broader discussion.

In light of these factors, CIRNAC recommends that the NWB defer any decision on the SSWQO until it can be thoroughly evaluated within the closure planning process. This will ensure a comprehensive review of post-closure water quality objectives, a thorough assessment of alternative treatment technologies, and the maintenance of regulatory consistency to safeguard long-term environmental integrity. Additionally, CIRNAC recommends that Agnico Eagle continue monitoring and refining predictive models and assimilative capacity assessments before revisiting the SSWQO discussion.

If there are any questions or concerns, please contact me at [Aminul.Haque@rcaanc-cirnac.gc.ca](mailto:Aminul.Haque@rcaanc-cirnac.gc.ca) or (867) 975-4282 or Andrew Keim at (867) 975-4550 or [Andrew.Keim@rcaanc-cirnac.gc.ca](mailto:Andrew.Keim@rcaanc-cirnac.gc.ca).

Sincerely,

Aminul Haque  
Senior Environmental Assessment Specialist