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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 2AM-MEA1530 / E7, E9

May 28, 2025

Colleen Prather
Permitting and Regulatory Affairs
Superintendent
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RE: Water Licence No: 2AM-MEA1530; Operational Notice – Development of Site-Specific Water Quality Objective for Total Dissolved Solids

Dear Colleen Prather:

On August 22, 2024, the Nunavut Water Board (NWB or Board) received the Operational Notice (Notice) of the Development of Site-specific Water Quality Objective (SSWQO) for Total Dissolved Solids (TDS) from Agnico Eagle Mines Limited (Agnico Eagle or Licensee) for the Water Licence 2AM-MEA1530 (Licence) issued for the Meadowbank Gold Mine Project (Project).

The Notice was submitted in accordance with Water Licence 2AM-MEA1530, specifically under Part E, and Part F, following measured TDS concentrations in Pit E and Goose Pit exceeding model predictions by over 20%. As required under Part E, Items 7 and 9, Agnico Eagle identified the causes as variations in water levels and infiltration rates affecting contaminant loading. To address potential risks, an action plan was developed, beginning with the creation of SSWQO for TDS. The plan also included acute and chronic toxicity assessments and an evaluation of assimilative capacity in the receiving environment. The Notice included the following as appendices:

- Appendix A: Meadowbank Complex 2023 Annual Report
- Appendix B: Meadowbank Water Management Plan V13

On August 22, 2024, the NWB acknowledged and distributed the Notice for review with the deadline for comments set for September 19, 2024. On September 11, 2024, the Kivalliq Inuit Association (KIA) requested for an extension, and the deadline for comments was moved to

October 17, 2024. The NWB received submissions from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), and KIA. The Licensee provided their response to comments (first round) on November 12, 2024.

On December 16, 2024, KIA advised the Board that they will be looking forward to further information such as assimilative capacity of the receiving environment, species sensitivity distributions for TDS, and updates to the models used to forecast pit water quality. ECCC and CIRNAC noted that they will provide their responses on December 20, 2024, and December 24, 2024, respectively.

On December 31, 2024, Agnico Eagle was requested to respond to comments (second round) by January 17, 2025. Agnico Eagle requested for an extension till January 29, 2025. On January 29, 2025, Agnico Eagle provided their response to second round of comments from parties. The response included the following:

- Appendix A: Summary of SSWQO's Developed by WSP in Nunavut and Northwest Territories
- Appendix B: Revised TDS SSWQO Report
- Appendix C: Assimilative Capacity Report – Wally Lake

On February 17, 2025, the NWB invited all parties to a teleconference to further discuss the Notice and pending concerns. The teleconference was scheduled for March 4, 2025. Following the teleconference, parties were requested for final submissions by April 2, 2025. CIRNAC, KIA, and ECCC provided their final submissions on March 31, 2025, April 1, 2025, and April 2, 2025, respectively. Agnico Eagle provided their final responses to comments on April 23, 2025.

Parties' comments and recommendations are summarized below. The NWB recommends to refer to the original submissions by all parties for a more detailed discussion and information.

<u>KIA</u>

- Continued exceedances of modelled TDS in Pit E and Goose Pit indicate a need to validate and update models.
- Impacts of site-specific water quality guidelines on the receiving environment are unclear, especially when exceeding CCME standards without elevated baseline data.
- Greater understanding of environmental impacts is needed to assess implications for Inuit use.
- Agnico Eagle committed to providing more data: assimilative capacity, species sensitivity distributions, and model updates for pit water quality. KIA believes this data is essential for future discussions on the need and development of a TDS SSWQO during closure planning.
- KIA acknowledges receipt of requested documentation in second response. KIA understands the rationale behind the proposed SSWQO equal to 1000 mg/L. However, KIA prefers a guideline based on baseline TDS levels and the use of mitigation measures where possible.

Agnico Eagle's Response:

- Agnico Eagle agrees that model validation and updates for TDS are ongoing to support the updated closure and reclamation plan.
- The most conservative 2024 model was used to develop interim benchmarks to ensure protection at the highest predicted TDS levels.
- There are no CCME or generic guidelines for TDS because its toxicity is highly site-specific, depending on local geological conditions.
- TDS benchmarks were developed using the CCME framework to assess actual risk to aquatic life in pit lakes and Wally Lake.
- The proposed SSWQO for TDS is considered protective of the receiving environment.
- No discharge to the receiving environment is occurring as part of this notification.
- The SSWQO will define effluent quality during closure and potentially in later operational years.
- An assimilative capacity model was conducted for Wally Lake:
    - Predicted 95th percentile TDS at the edge of the mixing zone (EMZ) is 1,285 mg/L, slightly above the interim SSWQO of 1,000 mg/L.
    - Chronic testing of invertebrates (C. dubia) and algae (R. subcapitata) showed no observable effects at TDS levels of 2,217–2,226 mg/L.
    - Chronic toxicity testing for fathead minnow is ongoing, and final SSWQO will be determined in November 2024.
- Predicted lake-wide TDS concentration is 523 mg/L, approximately 4 times lower than the No Observable Effect Concentration, indicating low risk to sensitive aquatic life in Wally Lake.

<u>CIRNAC</u>

CIRNAC provided a number of recommendations during their initial comments submission on October 17, 2024. Following is a list of recommendations and summary of responses by the Licensee:

- In-Pit Tailing Deposition – the NWB should not allow site-specific water quality objectives for pit lakes used for in-pit tailing deposition. Instead, Agnico Eagle should be required to implement appropriate mitigation measures to achieve the post-closure pit lake water quality objectives.

  Response – Agnico Eagle is following Part E, Item 7 of the Water Licence, which permits SSWQO when baseline or CCME guideline concentrations for re-flooded pit water cannot be met. Given that no CCME guideline exists for TDS and model predictions suggest baseline levels are unachievable, Agnico Eagle has implemented mitigation measures and conducted site-specific risk assessments to support the development of a conservative, protective TDS SSWQO based on CCME-recommended methodologies.

- Uncertainty and Potential Risks – The NWB to reject the proposed site-specific effluent quality criteria (EQC) and SSWQO for TDS due to significant uncertainty, data gaps, and

risks of long-term environmental harm. Following CCME guidelines would offer a more precautionary and scientifically sound approach to ecosystem protection.

Response – Agnico Eagle respectfully disagrees with CIRNAC's comments, stating it is complying with the rigorously developed and approved Water Licence and has provided data showing no long-term environmental harm. The proposed EQC of 4,000 mg/L and SSWQO of 1,000 mg/L are considered conservative, based on CCME protocols, literature review, and site-specific toxicity testing that showed no acute or chronic toxicity at significantly higher TDS concentrations.

- Water Quality Parameter Exceedances – Agnico Eagle to investigate the causes of exceedances for all water quality parameters, not just TDS, and develop appropriate mitigation measures to ensure compliance with post-closure pit water quality objectives. This approach will help address the broader environmental risks and ensure long-term ecosystem protection.

  Response – For clarity, there is no exceedance of TDS as it is not being discharged to the environment, and this notice specifically addresses TDS in accordance with Water Licence conditions; other parameters may be assessed for risk in the future using a similar approach.

- Closure Planning – Agnico Eagle to convene an annual workshop with regulators and interested parties to discuss closure planning and mitigation measures to meet post-closure pit lake water quality objectives for the Meadowbank and Whale Tail Mines.

  Response – Agnico Eagle acknowledges the need for discussion on closure planning and will continue providing updates through the Annual Report and the next Closure and Reclamation Plan (CRP), which is scheduled for submission in 2025. A preliminary version will be shared with CIRNAC and KIA by the end of 2024, and the Final Closure and Reclamation Plan (FCRP) will be submitted to the Board at least 12 months before the end of planned mining, as required by the Water Licences.

- Water Quality Prediction Methods – Agnico Eagle to revisit its water quality modelling assumptions and approaches used for the Meadowbank project to ensure all future project decisions (particularly closure) are informed by sufficiently accurate predictions.

  Response – Agnico Eagle has produced an updated water balance and water quality model in 2024 which will be included as part of the CRP.

CIRNAC provided their comments and expressed concerns during second round of comments submission on December 24, 2024. Following is a summary of their comments and Licensee's responses:

- SSWQO Justification and Regulatory Concerns – CIRNAC acknowledges that Part E, Item 7 of the Water Licence allows for SSWQO development but maintains that its primary purpose is to meet baseline or CCME water quality standards. CIRNAC does not support the proposed TDS SSWQO, citing insufficient justification, contradictions with previous

assurances, and concerns about setting a precedent that could risk the receiving environment and undermine closure objectives.

Response – Agnico Eagle disagrees with CIRNAC's interpretation, stating it is compliant with the Water Licence and that developing a TDS SSWQO is standard, science-based, and supported by regulators. Mitigation efforts are underway and further measures are included in the 2024 Closure and Reclamation Plan.

- Data Gaps and Risk Assessment Limitations – CIRNAC acknowledges Agnico Eagle's response but maintains that significant gaps remain regarding uncertainty, long-term harm, assimilative capacity, chronic toxicity, and geographic applicability of the proposed TDS SSWQO. CIRNAC is concerned that the SSWQO is based on limited data, unvalidated models, and lacks sufficient long-term, site-specific toxicity testing, making it difficult to confirm that the objective will protect aquatic ecosystems under Meadowbank's specific environmental conditions.

  Response – Agnico Eagle disagrees with CIRNAC's concerns, stating that the SSWQO was developed by WSP using rigorous, site-specific methods aligned with CCME and ECCC protocols. The company defends the robustness of its chronic toxicity testing, data selection, and use of assimilative capacity modelling, and directs reviewers to the updated SSWQO and Assimilative Capacity Reports (Appendices B and C). Agnico Eagle emphasizes that the selected datasets, toxicity endpoints, and modelling approach are scientifically sound, representative of local conditions, and meet regulatory standards, with further data collection and validation ongoing as part of the closure planning process.

- Model Discrepancies and Precedent Concerns – CIRNAC notes that Agnico Eagle did not explain the 275% average exceedance in TDS or address other significant water quality exceedances, such as dissolved arsenic exceeding predictions by over 21,000%. CIRNAC is concerned that pursuing site-specific criteria for TDS could set a precedent for relaxing standards for other contaminants, undermining the Water Licence's intent and risking the long-term protection of the Meadowbank ecosystem.

  Response – Agnico Eagle is fully compliant with Part E, Item 7 of the Water Licence, which allows for the development SSWQOs, as previously done and approved for other parameters in Nunavut. The current Notice addresses TDS only, following exceedances of modelled predictions, and outlines an action plan involving water transfer and development of EQC and SSWQO based on acute and chronic toxicity testing and assimilative capacity assessments. The approach aligns with past NWB and ECCC guidance, with updated models and plans included in the November 2024 CRP.

- Closure Plan – CIRNAC reiterates the importance of a comprehensive, transparent closure plan aligned with regulatory requirements to ensure long-term ecosystem protection.

  Response – Concerns raised are addressed in the CRP submitted in November 2024 for review by CIRNAC and KIA.

- Future Modelling and Data Needs – CIRNAC stresses the importance of Agnico Eagle clearly explaining its prediction methods, resolving past discrepancies, and incorporating site-specific data to improve the accuracy of future water quality forecasts, and looks forward to reviewing the updated models.

  Response – Agnico Eagle disagrees with the claim that its model forecasts are inaccurate, stating that models are regularly verified and calibrated using site-specific data. The current notice addresses a past TDS discrepancy by updating the model and establishing a TDS SSWQO for Wally Lake to guide future mitigation needs, although no discharge is currently occurring.

Following is a summary of comments provided by CIRNAC in their final submission on March 31, 2025, following the teleconference:

CIRNAC maintains that the proposed SSWQO for TDS should be addressed within the broader closure planning process for the Meadowbank Mine, rather than as a standalone issue. While Part E, Item 7 of the Water Licence allows for the development of site-specific objectives, CIRNAC emphasizes that such criteria should only be considered once it is clearly demonstrated that closure water quality objectives cannot be met through available mitigation and treatment measures. To date, Agnico Eagle has not provided sufficient justification for this. Measured TDS levels in Goose Pit have exceeded predictions by 275%, contradicting earlier assurances and raising concerns about model reliability. Given the uncertainties around tailings composition, potential covers, source inputs, and treatment options, CIRNAC recommends deferring any decision on the SSWQO until the FCRP is developed, where water quality objectives can be evaluated holistically alongside ongoing model refinement. Notably, Agnico Eagle has already initiated discussions and workshops on the draft CRP 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.

<u>ECCC</u>

ECCC provided a number of recommendations during first round of comments submission on October 16, 2024. Following is a list of recommendations and a summary of responses from Agnico Eagle:

- Consideration of Mitigation and Management Options – Provide a discussion of potential mitigation or management options that could be implemented to improve water quality during operations, closure, and post-closure.

  Response – As per Part E, Item 7, Agnico Eagle initiated the development of a TDS SSWQO after measured TDS levels in Portage Pit E and Goose Pit exceeded model predictions by over 20%. The request was not due to poor water quality, and current mitigation measures are considered sufficient, with model calibration underway to improve future predictions.

- Comparison to Existing Conditions and Predicted Future Effluent and Water Quality to Effluent Quality Criteria and Site-Specific Water Quality Objectives – Provide a comparison of how both measured and predicted concentrations in the pits and receiving environment compare to the proposed EQC and SSWQO, respectively.

  Response – The notice was issued because measured TDS concentrations in Portage Pit E and Goose Pit exceeded model predictions by over 20%. Since there is no current discharge to the receiving environment, predictions were not included, but Agnico Eagle will meet the EQC and SSWQO once discharge begins.

- Effluent and Water Quality Model Update – Clarify whether an update to the effluent and water quality model has been undertaken as a result of measured concentrations exceeding predictions. If not, a model update be completed to refine source terms and predictions to address measured concentrations exceeding predictions.

  Response – Agnico Eagle has an updated water quality model to be submitted in 2025, with earlier model predictions supporting toxicity and assimilative capacity studies for the TDS EQC/SSWQO.

- Data Inconsistencies – Provide clarification on why the observations of reduced survival referred to in Section 1-3.0 are not included in Table 1-2; and complete a review of Table 1-2 and Figure 1-3 for accuracy, and provide updated tables/figures, as required.

  Response – The table was intended to show LC50 at 100% TDS, so reduced survival was not included. Table 1-2 and Figure 1-3 accurately present LC50 results and TDS composition and do not require updates.

- Justification for Effluent Quality Criteria – Provide an interpretation of the results of acute toxicity testing resulting in <100% survival.

  Response – The 2022 Mock Effluent tests were used for background range-finding, showed low-level effects, and likely reflected other factors, not TDS toxicity. No acute toxicity was observed in the more definitive 2024 tests at much higher TDS levels.

- Chronic Toxicity and Existing Guidelines – Provide additional justification for proceeding with a TDS EQC and SSWQO, rather than sulphate, given existing precedence for similar projects within Canada. Consider a combined approach of including EQC and SSWQO for both sulphate and TDS.

  Response – The choice between TDS or sulphate for SSWQO should be site-specific; TDS is preferred here as it captures full ionic mixture effects, including hardness and osmotic stress, making it a more holistic and protective approach. Generating both TDS and sulphate SSWQOs is unnecessary, as the values are highly correlated.

- Receiving Environment Predictions – Provide additional details on the source of the dilution factor used to generate the predictions provided in Table 1-1 and additional clarity on what this table is intended to demonstrate.

  Response – Table 1-1 was intended to show both full-strength effluent and edge of mixing zone predictions, using a conservative dilution factor of 0.75, though actual predicted dilution is closer to 0.5 for Wally Lake and 0.077 for Third Portage Lake.

- Measured vs. Calculated TDS – Provide a discussion on the large differences in measured and calculated TDS that were observed on October 3, 2022, and December 2, 2022.

  Response – TDS differences arise from using measured (TDSmeas) vs. calculated (TDScalc) methods; Agnico Eagle prefers TDScalc, following APHA (2012), as it avoids lab interference and better reflects ionic composition relevant for toxicity assessment.

- Chronic Toxicity Dataset – Consider the development of a species sensitivity distribution to provide statistically robust justification for a proposed site-specific water quality objective.

  Response – Agnico Eagle is developing a species sensitivity distribution (SSD) to support the proposed 1,000 mg/L TDS SSWQO, with long-term fish toxicity data expected by November 2024. Site-specific data will be prioritized, but literature data will also be used to meet CCME Type A derivation (CCME's 2007 minimum data requirements for developing the SSD-based guideline).

- Site Reference Chemistry – Clarify the source of the site reference chemistry for major ions that is provided in Table 2-3. This should include a discussion/clarification on the discrepancies between this table and other sections of the report.

  Response – Agnico Eagle does not believe there are discrepancies in Table 2-3 but has clarified the source of site water used for testing to avoid confusion. The reference to synthetic waters was a carryover from a previous report version and will be corrected in the revised TDS report.

- Report Inconsistencies – Inconsistencies in the report to be reviewed for accuracy, and clarifications provided as needed.

  Response – The revised TDS report, expected in December 2024, will incorporate ECCC feedback, ongoing test results, and relevant clarifications to ensure accuracy.

ECCC provided the following recommendations during their second round of comments submission on December 20, 2024. The summary of responses by Agnico Eagle is also listed below:

- Consideration of Mitigation and Management Options – ECCC's recommendation remains unchanged with regards to consideration of mitigation and management options.

Response – The first mitigation step is developing an SSWQO protective of the environment, followed by water management planning to meet or exceed it. The TDS SSWQO of 1,000 mg/L is supported by model predictions and will be integrated into the updated CRP for submission in Q2 2025.

- Comparison to Existing Conditions and Predicted Future Effluent and Water Quality to Effluent Quality Criteria and Site-Specific Water Quality Objectives – Provide a comparison of forecasted parameter concentrations in the pits with the proposed EQC; and provide a comparison of measured and predicted concentrations in the receiving environment with the proposed SSWQO.

  Response – The predicted EQCs are based on a highly conservative water balance and water quality model from the August 2024 submission and Appendix C, and while EQCs may be adjusted if a less conservative model is used, the SSWQO of 1,000 mg/L will remain unchanged and protective of the environment. Additional summary tables comparing the forecasted concentrations of TDS at the end of pipe and any additional pieces of information will be available for review by Q2 of 2025 with the submission of the CRP to the NWB.

- Data Inconsistencies – Provide the following to address data inconsistencies:
  - survival rate data for the following toxicity tests: 17 May 2022, 27 May 2022, 3 October 2022, 24 October 2022, 2 December 2022, 7 December 2022 (for Daphnia magna), 2 January 2023, 1 February 2023, and 13 April 2023.
  - measured total dissolved solid compositions for toxicity tests performed on 2 December 2022 and 2 January 2023.
  - toxicity test results for TDS compositions reported for 7 December 2022 (for D. magna) and 1 February 2023 (for both D. magna and rainbow trout).

  Response – The inconsistencies noted by ECCC were due to a typographic error in test dates, not data exclusion, and have been corrected in the revised report. Table 1-2 has been updated to include survival percentages, measured and calculated TDS concentrations, and corrected dates, as reflected in Appendix B of the response package.

- Justification for Effluent Quality Criteria – Discuss possible influence of different ion mixtures contributing to TDS on the results of acute toxicity testing resulting in <100% survival.

  Response – The 2022 Mock Effluent tests were used for background purposes and showed minor toxicity at lower TDS levels, likely due to other constituents, not TDS. The 2024 site-specific tests showed no toxicity at much higher TDS levels, and differences in ionic composition did not affect the SSWQO derivation.

- Chronic Toxicity and Existing Guidelines – Suggest how the proposed TDS EQC and SSWQO could be modified or augmented to account for varying ionic mixture composition.

  Response – The TDS, sulphate, and chloride sources have been described in annual reports, and while TDS levels are expected to decrease post-operations, a re-evaluation would occur

if concentrations remain high or the ionic mixture changes. Agnico Eagle has incorporated site-specific TDS composition and conservative modelling in the SSWQO development and will reassess the benchmark if future effluent quality changes significantly, ensuring the SSWQO is always met.

- Measured vs Calculated TDS – Any criteria for TDS be for measured TDS.

  Response – The differences between TDSmeas and TDScalc are due to variations in lab reporting versus toxicological calculation methods. To address ECCC's comment, both measured and calculated TDS values will be included in the revised report, but the SSWQO will be based on calculated TDS to ensure consistency between exposure and effect concentrations.

- Site Reference Chemistry – Discuss why water chemistry of the reference site, Third Portage Lake, has changed between the work in Attachments 1 and 2. Attachments 1 and 2 should address both the difference in TDS and difference in ionic mixture proportion.

  Response – The differences between historical data (2011–2021) and recent measurements are due to the use of historical Third Portage Lake chemistry to design test scenarios, while actual site water for testing was collected from a raw drinking water intake pipe due to unsafe conditions. These differences did not affect the validity of the study, as the water was amended in the lab to reflect future discharge conditions, and this explanation is now included in the final report (Appendix B).

As noted earlier, during the teleconference on March 4, 2025, parties were requested to provide their final submissions. Following are the recommendations provided by ECCC in their final submission on March 28, 2025, with summary of responses by Agnico Eagle:

- Species Sensitivity Distribution – To increase consistency with CCME (2007) ECCC provides the following recommendations:
  - Endpoint selection should be revisited and geomeans recalculated for rainbow trout, fathead minnow, *H. azteca, C. triangulifer,* and *C. dilutus*
  - For fathead minnow, the MATC (541 mg/L) be retained in the dataset or the 34-d IC10 of 500 mg/L (Wang et al. 2016) be used
  - Include the 28-d LC10 of 502 mg/L for *Villosa iris* (Wang et al. 2016) in the SSD.

  Response – Agnico Eagle and WSP reviewed the recommendations, revised data processing, and confirmed that the re-derived SSDs support the original SSWQO of 1,000 mg/L. The response includes discussion on endpoint selection and species mean chronic values, and an updated SSD and HC5 calculation, with rationale provided for any maintained original decisions.

- TDS Trigger – ECCC recommends that, if the SSWQO is approved, the Licensee provide wording on the specific conditions (i.e. degree of change/divergence in ionic composition) that would trigger re-evaluation of the TDS dataset.

Response – Agnico Eagle will re-evaluate the TDS SSWQO if the proportion of sulphate in the TDS mixture falls outside 15–40% for low TDS (<500 mg/L) or 30–60% for high TDS (>500 mg/L). The re-evaluation will assess the nature of the compositional change and may involve toxicity modeling or additional site-specific testing.

- Assimilative Capacity – ECCC recommends the Proponent quantify the dimensions of the mixing zone in Wally Lake and the distance from the discharge point where the SSWQO would be expected to be achieved based on the 2:1 dilution factor used in the Assimilative Capacity Assessment.

  Response – A 3D hydrodynamic model for Wally Lake established a minimum dilution of 2:1 at the 100 m mixing zone boundary, a standard regulatory guideline used to allow effluent mixing before meeting water quality criteria. This boundary has been consistently applied and approved at all Agnico Eagle operations in Nunavut.

Copies of all documents received in support of the Notice and comments provided by all parties can be accessed through the NWB's Public Registry site using the following link:

https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MEA1530%20Agnico/3%20TECH/G%20MODIFICATIONS/2024/

NWB's Review and Decision

The NWB acknowledges that Agnico Eagle's Notice is consistent with the requirements of Part E, Item 7 of Water Licence 2AM-MEA1530. The Licence allows for the development of SSWQOs that are protective of the aquatic environment, subject to Board approval. The NWB recognizes that parties have presented differing views regarding the appropriateness and timing of the proposed SSWQO for TDS.

CIRNAC recommended that the SSWQO be deferred and addressed within the Final Closure and Reclamation Plan (FCRP), rather than as a standalone initiative. CIRNAC also raised concerns regarding the lack of sufficient justification for not meeting baseline or CCME guidelines, the absence of long-term site-specific toxicity testing, exceedances of other water quality parameters beyond TDS, and the potential precedent that might be set by approving site-specific criteria in advance of closure planning. ECCC identified a number of issues requiring clarification or additional information, including the rationale for selecting TDS over sulphate, inconsistencies in toxicity data, long-term uncertainty in ionic composition, measured versus predicted water quality in the receiving environment, and assumptions surrounding dilution factors and mixing zone boundaries. Agnico Eagle in their responses maintained that this is an operational notice and that they are in compliance with the Water Licence 2AM-MEA1530. Agnico Eagle also emphasized that the development of site-specific criteria is scientifically sound and aligned with industry best practices, and highlighted the use of calibrated predictive models and existing mitigation strategies, with adaptive management measures available as needed. In addition, Agnico Eagle provided supplementary information and details in their responses to comments and concerns raised by Interveners.

The Board, having reviewed all the submissions and responses, confirms that the Notice is not in conflict with the conditions of the Licence and acknowledges that no objections were provided by Interveners regarding the proposed SSWQO for TDS being protective of the receiving environment, and hence approves the proposed SSWQO for TDS as per Motion No. 2025-A1-004. The Board, however, also acknowledges some concerns by Interveners specifically related to the timing of developing the SSWQO and its relation to the overall closure planning. The Board's understanding is that the CRP is in development and that an initial draft has already been shared with KIA and CIRNAC for their review and input. The Board's expectation is that, through the ongoing discussions and potential workshop as part of the final closure planning process, there will be further discussions regarding the overall closure objectives. If new evidence or information is presented that is not supportive of the proposed SSWQO for TDS being protective of the receiving environment, the Board may require the Licensee to revisit the approved SSWQO for TDS. The Board is also emphasizing that Agnico Eagle will re-evaluate this SSWQO based on changes of sulphate proportion in the TDS.

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to licensing@nwb-oen.ca or by phone at (867) 360-6338.

Sincerely,

Abid Jan
Technical Advisor
Nunavut Water Board

Cc: Distribution List – Meadowbank