



Fisheries and Oceans
Canada

Pêches et Océans
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Fish and Fish Habitat Protection Program
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Programme de protection du poisson et de son habitat
301 – 5204 50th Ave. (Franklin)
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March 4, 2026

Your file *Votre référence*

2AM-MEA1530

2AM-WTP1830

Our file *Notre référence*

03-HCAA-CA7-00109

16-HCAA-00370

Nunavut Water Board
Attn: Richard Dwyer
Manager of Licensing
PO Box 119
Gjoa Haven, NU
X0B 1J0

Via email to: richard.dwyer@nwb-oen.ca

Subject: Comment Request for Agnico Eagle Mines Limited's Updated Interim Closure and Reclamation Plan (ICRP) for the Meadowbank Complex for water licences 2AM-MEA1530 and 2AM-WTP1830

Dear Richard Dwyer,

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your request for comments on December 16, 2025. DFO has reviewed Agnico Eagle Mines Limited's (AEM) Updated Interim Closure and Reclamation Plan (ICRP) for the Meadowbank Complex for water licences 2AM-MEA1530 and 2AM-WTP18302024, in regards to its mandate, related to the management, protection and conservation of fish and their habitats.

The Nunavut Water Board (NWB) invited parties to submit comments on or before February 27, 2026, with an extension provided until March 4th, 2026.

Specifically, DFO has reviewed the following:

- Interim Closure and Reclamation Plan for the Meadowbank Complex, December 2025, Version 1
- Appendix 1-A: Meadowbank Closure Consultation and Engagement Comments and Questions
- Appendix 2-A: Meadowbank and Whale Tail 2024 Geotechnical Inspection Report
- Appendix 5-A: Progressive Reclamation of Quarries
- Appendix 5-B: Progressive Reclamation Photographs

- Appendix 6-A: Closure and Post-closure Monitoring Plan
- Appendix 6-B: Reclamation Research
- Appendix 6-C: Closure Investigation Work Plan
- Appendix 6-D: Human Health and Ecologic Risk Assessment
- Appendix 6-E: Meadowbank Water Balance and Water Quality Model – Technical Report
- Appendix 6-F: Technical Memorandum – Predictive effects assessment for fish in the pits at Meadowbank during closure
- Appendix 8-A: RECLAIM

DFO is generally agreeable with Agnico Eagle Mine’s ICRP and has the following comments to provide at this time for the NWB’s consideration.

Comment Number:	DFO-1
Subject/Topic:	All-Weather Access Road (AWAR) And Whale Tail Haul Road (WTHR) Fish Bearing Water Crossings.
References:	6.7.3.4 Culverts 6.11 Transportation Routes Appendix 5-A All-weather Access Road and Whale Tail Haul Road Quarries Progressive Reclamation Plan
Comment:	Both the AWAR and WTHR have a significant number of fish-bearing water crossings. The ICRP states that these two roads may be either removed and reclaimed or remain in place and be transferred to the local community with local interest and regulatory approval. If the roads are removed, physically stable fish passage will have to be established following culvert/bridge removal. If the roads remain, fish passage will have to be maintained for the life of the road, and reestablished if the road is ever removed.
Conclusion/Request:	If the roads are removed: <ul style="list-style-type: none"> • Each fish bearing water crossing will require design for fish passage and long term physical stability. DFO will require a request for review for these crossings along with the designs. • Monitoring will be required at these locations post closure and reclamation to ensure they remain stable. • What will be the schedule for providing general design of fish bearing water ways?

	<p>If the roads remain in place:</p> <ul style="list-style-type: none"> • What will be the long term plan for maintaining culverts along the these roads? • Which party will be responsible for maintaining these water crossings? <p>What contingencies will be put in place under both scenarios if the fish bearing water crossings are structurally unstable and/or causing obstruction to fish passage.</p>
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Comment Number:	DFO-2
Subject/Topic:	Fish Habitat Exposure To PAG/ML Rock Run-Off.
References:	6.11 Transportation Routes Appendix 5-A All-weather Access Road and Whale Tail Haul Road Quarries Progressive Reclamation Plan
Comment:	<p>There are numerous water bodies and watercourses adjacent to the AWAR route where run-off could affect fish habitat.</p> <p>Section 6.11.7 states, “If exposed rock on the AWAR or the Whale Tail Haul Road corridor result in acidification of surface water, then such impacts will be assessed, and an appropriate mitigation strategy will be put in place.”</p>
Conclusion/Request:	Please provide a list of potential mitigations to be used if PAG/ML rock leaches to fish bearing surface waters?

Comment Number:	DFO-3
Subject/Topic:	Fish Access To Quarries And Burrow Sites Along The AWAR And WTHR.
References:	6.12 Quarries and Borrow Sites Appendix 5-A All-weather Access Road and Whale Tail Haul Road Quarries Progressive Reclamation Plan
Comment:	Section 6.12.3 states, “In some cases, quarries may have a flooded floor (entirely or some significant sections). Water within these quarries will be left as-is in closure and post-

	<p>closure. Thus, Agnico Eagle proposes to leave the water pond as-is. Considering that draining large quantities of water in low laying areas would require extensive work to create draining channels, this option is proposed as it is considered less disturbing to the environment while continuing to ensure proper water quality.”</p> <p>It is unclear from the section if there is potential for flooded quarries to connect to water bodies and water courses adjacent to the AWAR and become fish habitat.</p>
Conclusion/Request:	<p>Please provide a list, and map, of quarries that are likely to contain flooded floors or significant sections of flooding, and comment for each one on the likelihood to connect to waterbodies or water courses nearby during high water periods.</p>

Comment Number:	DFO-4
Subject/Topic:	Post-Closure Monitoring Of Fish And Fish Habitat
References:	Appendix 6-A: Closure and Post-Closure Monitoring Plan
Comment:	<p>The Closure and Post-Closure Monitoring Plan (CPCMP) contains aspects of geotechnical and water quality monitoring at the Whale Tail and Meadowbank Mine sites, and along the AWAR and WTHR, that will impact fish passage and fish habitat. <i>Table 4.1-1: Operational Monitoring and Management Plans to be Incorporated into the CPCMP</i> includes a number of Plans with fish and fish habitat monitoring.</p> <p>However, there are aspects of fish and fish habitat monitoring are not included in the CPCMP. For example, fish passage along the roadways and to quarries (as discussed in comments above), drainage channels, and other site features will all be influenced by the physical and chemical stability of the post-closure environment.</p> <p>Including additional aspects of fish and fish habitat monitoring into the CPCMP (i.e. passage, access to and presence in abandoned infrastructure, etc.), would ensure the post-closure environment remains protective of fish and fish habitat.</p>

Conclusion/Request:	DFO recommends that CPCMP include additional aspects of fish and fish habitat monitoring: <ul style="list-style-type: none">• a list of locations where fish passage will be reestablished, how these will be deemed suitable for fish and physically stable, and how this will be monitored;• a list of locations, and a map, where fish will have access to mine infrastructure (end pit lakes, quarries, drainage channels, etc.), how these features will be deemed suitable for fish, and how this will be monitored; and• any other aspects deemed relevant for the protection of fish and fish habitat in the post-closure environment.
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If you have any questions with the content of this letter, please contact Derek Donald by phone at 403-827-6781, or by email at Derek.Donald@dfo-mpo.gc.ca. Please refer to the file number referenced above when corresponding with the Program.

Sincerely,



Jennifer Loughery
Acting Senior Biologist
Fish and Fish Habitat Protection Program
Fisheries and Oceans Canada

CC:

José Audet-Lecouffe, Fisheries and Oceans Canada
Derek Donald, Fisheries and Oceans Canada