Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

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

Your file - Votre référence
2AM-MEA1530
Our file - Notre référence
GCDocs#149793329

September 4, 2026

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 comments on the Response to Second Round Comments on the Interim Closure Reclamation Plan for the Meadowbank Complex

Dear Mr. Dwyer,

This letter is provided in response to Agnico Eagle Mines Limited's (Agnico Eagle) August 14, 2026 response to comments received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) regarding the updated Meadowbank Complex Interim Closure and Reclamation Plan (ICRP) submission of December 15, 2025.

CIRNAC appreciates Agnico Eagle providing a response, however it does not address many of the department's requests. Throughout the response, the Proponent indicates that sufficient information has already been provided and that no further information is required; CIRNAC maintains that many of these requests were intended to obtain the information necessary to independently assess and verify the proposed closure concepts and to provide the information for the formal file record. These requests have received multiple insufficient answers throughout this process and remain areas of concern.

CIRNAC remains concerned of potential recognition of certain ICRP components as "final" through an ICRP review process rather than through review of an integrated Final Closure and Reclamation Plan (FCRP). There has been no public review and suggesting any part of the closure plan as "final" is concerning.

While CIRNAC supports progressive reclamation, progressive reclamation does not, in itself, establish a final approved closure strategy. Agnico Eagle's responses have not provided adequate explanation of why the items questioned in the department's responses should be treated

differently and classified as final. As stated in our previous response, advancing singular closure components in isolation increases the risk that assumptions embedded in the design will later conflict with site-wide closure requirements. Final closure determinations can only be supported by a complete evidentiary record and considered through the appropriate public closure planning process.

Several concepts presented in the current ICRP differ materially from closure approaches previously reviewed through earlier regulatory processes. Many changes lack justification as to why the previous approach was unsuitable or whether risks associated with the changes are introduced or increased. Treating such concepts as final at the ICRP stage creates a risk that significant closure decisions are made before the full evidentiary record, public review, and integrated FCRP assessment have been completed.

For such concepts to be treated as "final", further discussions on securities would be required to re-examine changes to previously approved closure plans. This process will also need to address the lack of a verification procedure for progressive reclamation, under an approved FCRP as required by the Licence, until such time no security related to progressive reclamation can be relinquished.

CIRNAC remains concerned that there is currently no agreed framework describing how progressive reclamation will be verified, what evidence will be required to demonstrate successful completion of closure activities, or how future reductions in financial security would be assessed.

In CIRNAC's view, the issue before the Nunavut Water Board (Board) is not whether the proposed closure concepts may ultimately prove acceptable. The issue is whether sufficient information exists on the record to support the decisions currently being requested. CIRNAC remains of the opinion that the evidentiary record is incomplete, contains proposed strategies which are unvalidated, and does not support treating any component of the ICRP as a final closure strategy.

CIRNAC also understands and supports that the Kivalliq Inuit Association requires further engagement in order to support the Proponent's proposal in the ICRP.

CIRNAC appreciates the complexity of the issues currently before the Board and recognizes the Board's authority and responsibility to make its determination on this matter. The comments provided in this letter are intended to assist the Board in its consideration of the ICRP and to identify the regulatory, technical, and evidentiary concerns.

At this time, CIRNAC assesses the ICRP as incomplete as the department has unresolved concerns.

Sincerely,



Jeff Hart

A/Director, Resource Management
Crown-Indigenous Relations and Northern Affairs Canada
jeff.hart@rcaanc-cirnac.gc.ca
Tel: (867) 975-3875

CC
Andrew Keim, Manger Water Resources – CIRNAC
Luis Manzo, Director or Lands – Kivalliq Inuit Association