



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-MEL1631
Our file - Notre référence
GCDOCS#148557108

July 17, 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's Review of the
Licence Amendment Application for Meliadine Gold Project, Type A Water
Licence No. 2AM-MEL1631**

Dear Richard,

Thank you for the June 4, 2026 invitation to review the referenced licence amendment application, submitted by Agnico Eagle Mines Ltd., for Type A Water Licence No. 2AM-MEL1631.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application 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*. Please find CIRNAC comments and recommendations in the attached Application Completeness Review Memorandum.

If there are any questions or concerns, please contact me at (587) 338-6428 or sarah.forte@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

Sarah Forté,
Regional Coordinator



Application Completeness Review Memorandum

Date: July 17, 2026

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Sarah Forté – Regional Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Amendment Application for Meliadine Gold Project, Type A Water Licence No. 2AM-MEL1631

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Meliadine Gold Mine Project is located near the western shore of Hudson Bay in the Kivalliq Region of Nunavut, approximately 25 km north of Rankin Inlet. The project is owned and operated by Agnico Eagle Mines Ltd. (Agnico Eagle) under Type A water licence No. 2AM-MEL1631.

Agnico Eagle is applying for the amendment of their licence to optimize operations. Changes requested include:

- Extending the mining on site and licence term by 5 years
- Use of pits to store and manage saline groundwater and contact water
- Increased water use
- Additional infrastructure including: increased fuel storage, ore storage pads, and temporary tailings storage pads
- Addition of composting to waste management

CIRNAC provides the following information requests pertaining to the application package. Several comments included in our 2025 Annual Report review (submitted to the Nunavut Water Board on July 10, 2026) are re-iterated in this document, since responses will help inform our technical review of the amendment application. A summary of the subjects of information requests can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed information requests can be found in Section C.

**Table 1: Summary of Information Requests**

Information Request Number	Subject
IR-01	Updated security estimate
IR-02	Saline water management
IR-03	Extension of mining depth at Pump deposit
IR-04	Predicted groundwater inflows to Tiriganiaq underground
IR-05	Flooding of underground mines with saline water at closure
IR-06	Watershed area update in the Water Balance Water Quality Model
IR-07	Annual discharge volumes to Itivia Harbour
IR-08	Sludge management during and after TIRI02 dewatering
IR-09	Additional freshwater requirement
IR-10	Commitment to eliminate discharge to Meliadine Lake
IR-11	Tailings volume clarification
IR-12	Temporary tailings storage
IR-13	Temporary ore storage next to portals
IR-14	Tailings storage facility - remaining capacity and expansion

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and referenced during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
Meliadine 2AM-MEL1631 Water Licence Amendment Operational Update - Main Application Document	Agnico Eagle Meliadine Gold Mine, June 2026
Application for Water Licence Amendment	Agnico Eagle Meliadine Gold Mine, June 6, 2026
Appendix 4B: Meliadine Project - Updated Groundwater Modelling for Tiriganiaq and Pump Undergrounds and In-pit Water Storage	WSP Canada Inc., CA0042236.1659-MEL2026-006-TM-Rev1, March 23, 2026
Appendix 4C: Meliadine Mine Operational Update: Water Balance and Water Quality Model Technical Report	Lorax Environmental Services, A667-5, April 21, 2026
Appendix 5B: ARD-ML Sampling and Testing Plan	Agnico Eagle Meliadine Gold Mine, V2, June 2026
Appendix 5F: Groundwater Management Plan	Agnico Eagle Meliadine Gold Mine, V14, June 2026



Document Title	Author, File No., Rev., Date
Appendix 5I: Interim Closure and Reclamation Plan – Update 2026	Agnico Eagle Meliadine Gold Mine, V3.0, June 2026
Appendix 5L: Mine Waste Management Plan	Agnico Eagle Meliadine Gold Mine, 6513-MPSV2-09, V15, June 2026
Appendix 5M: Ore Storage Management Plan	Agnico Eagle Meliadine Gold Mine, V9, June 2026
Re: Water Licence 2AM-MEL1631 Modification – Shallow Pump Underground Development within Permafrost and Water Storage in Pits	Agnico Eagle, June 27, 2025
Meliadine Gold Mine – 2025 Annual Report Main Document	Agnico Eagle Meliadine Gold Mine, V1, March 2026
Meliadine Mine Water Licence Amendment (2AM-MEL1631 - Main Application Document	Agnico Eagle Meliadine Division, January 2024

C. RESULTS OF REVIEW

1. Updated security estimate

Comment:

Changes were required to the Interim Closure and Reclamation Plan (Appendix 5I) as a result of the proposed amendment. Agnico Eagle recognizes a security update will be required through this water licence amendment and speaks to the review and discussion needed on security aspects but has not yet provided a security update.

CIRNAC appreciates Agnico Eagle's commitment to work with Kivalliq Inuit Association and CIRNAC during the technical review stage to reach agreement on security prior to the Final Hearing Public. We believe that a draft security estimate, including a new basis of estimate document outlining proposed/new unit rates and assumptions, should be included with the amendment application to provide adequate time for review.

Recommendation:

(IR-01) CIRNAC recommends that Agnico Eagle provide their revised security estimate as part of this completeness review stage.

2. Saline water management

Comment:

The need to discharge significant volumes of saline water at up to 20,000 m³ per day to the marine environment is one of the most significant variances to the Final Environmental Impact Statement water management plans and predictions for the Meliadine mine. The continual delay of saline water discharge has resulted in the storage of large volumes of saline water on site. The 2025 Annual Report reports ~0.9 million m³ in TIRI02 at the end of



2025. The saline water on site is a liability as uncertainty remains on its ultimate discharge to the receiving environment.

Section 4.2.2 of the Main Application Document states groundwater management strategies “include the following:

- *Short-term Strategy: Store saline contact water on site.*
- *Medium-term Strategy: Treat saline groundwater for discharge to receiving environment in Itivia Harbour via trucking.*
- *Long-term Strategy: Treat saline groundwater for discharge to receiving environment in Itivia Harbour via trucking.”*

This statement is confusing and contradictory to CIRNAC’s understanding of previously proposed saline water management and information contained in the Water Balance and Water Quality Model (Appendix 4C). For instance, the strategies listed above make no reference to the operation of the waterline between Meliadine and Itivia Harbour.

The quality of water discharged to Itivia Harbour is also unclear. Though Section 4.3.2 of the Main Application Document states “*Water quality modelling indicates that predicted concentrations of all effluent discharges will meet applicable regulatory limits during operations and closure.*”, Table 6-3 of the Water Balance and Water Quality Model present predicted ammonia concentrations at end-of-pipe to Itivia Harbour during operations that are above Metal and Diamond Mining Effluent Regulation maximum authorized concentrations. Agnico Eagle indicates that “*Options for treatment are being investigated*” but no details on the options or their performance are provided.

The inability to comply with Environment and Climate Change Canada requirements for *Acartia tonsa* testing has been a critical constraint since 2022 to the planned discharge of saline water to the marine environment at Itivia. The absence of an update on where Agnico Eagle stands with regard to being able to comply with the *A. tonsa* toxicity testing requirements results in significant uncertainty as to their plans and schedules for initiating marine discharge of stored saline water and saline water inflows from ongoing underground mining.

**Recommendation:**

(IR-02) CIRNAC recommends that Agnico Eagle:

- a. Clarify what time period and phase of operation is considered for groundwater management under:
 - i. Short-Term Strategy
 - ii. Medium-Term Strategy, and
 - iii. Long-Term Strategy.
- b. Provide additional information on truck haulage discharge to Itivia for the medium- and long-term groundwater management strategy;
- c. Provide a synopsis of ammonia management options that are being evaluated for saline groundwater; and
- d. Provide updated information regarding the status of *Acartia tonsa* toxicity management, including contingency measures if discharge toxicity objectives cannot be consistently achieved.

3. Extension of mining depth at Pump deposit**Comment:**

Section 3.3.2 of the Main Application Document states that “*Underground mining at Pump will be extended deeper (i.e., below permafrost) from that as approved in the 2025 Modification (Agnico Eagle 2025a).*” There is no reference to a licence amendment or modification for extending the depth of mining to below permafrost, and the application contains wording that could imply this activity has already been approved at Pump:

- Both the Application Form (Part 9) and Main Application Document (Section 1.2) state that mining will continue “*at assessed and approved deposits via open pit and underground methods for an additional five years to 2036*”
- The Main Application Document (Section 3.3.2) states: “*The mining methods used for open pit and underground mining will follow current on-site approved extraction methods.*”

Agnico Eagle’s 2025 modification request for the underground mining at Pump was very specific with respect to its location relative to permafrost: “*Development of a portal in Pump Open Pit 2 (PUMP02) to extend access to deposits within permafrost*”. CIRNAC therefore understands that underground mining below permafrost at Pump has neither been previously requested nor authorized.

Recommendation:

(IR-03) CIRNAC recommends that Agnico Eagle clarify whether it is seeking approval for mining below the permafrost at the Pump deposit.



4. Predicted groundwater inflows to Tiriganiaq underground

Comment:

Groundwater inflow volumes to the Tiriganiaq underground mine differ between the documents in the application, which makes it unclear if planned management strategies will be adequate.

- Table 4.2-1 in the Main Application Document has total inflow to Tiriganiaq (including seepage from WES03) rising to 1615 m³/day in 2028 and then decreasing. It does not specify if the values are for a base case or upper bound.
- Table 2 in the Groundwater Management Plan (Appendix 5F) has the same numbers as Table 4.2-1 of the Main Application, and they are labelled “*Upper-bound Model, Tiriganiaq Predicted Groundwater Inflows*”.
- The Updated Groundwater Modelling (Appendix 4B) presents data for both the base case and upper bound scenarios, in Tables 4 and 5 respectively. The values labelled as upper bound in Table 2 of the Groundwater Management Plan are equal to the base case predicted volumes in the Updated Groundwater Modelling. Upper bound predicted volumes for total inflow to Tiriganiaq underground are much higher, reaching 2675 m³/day in 2028.

Recommendation:

(IR-04) CIRNAC recommends that Agnico Eagle:

- a. Clarify why the upper range of groundwater inflows for Tiriganiaq underground mine in the Groundwater Management Plan are equal to the base case inflows provided in the Updated Groundwater Modelling; and
- b. Discuss any modifications necessary to the Groundwater Management Plan to manage inflows closer to the upper range predictions.

5. Flooding of underground mines with saline water at closure

Comment:

Section 4.3.1 of the Main Application Document states “*During active closure, saline water remaining in pits and ponds will be pumped to underground mine voids*”. Though this activity was part of earlier Interim Closure and Reclamation Plans, the water volumes have increased. Previously only saline water remaining in SP6 was to be disposed of underground and the current proposal potentially includes volumes from WES02 and PUMP02. The submission does not present information describing the potential influence of saline water



on permafrost and, by extension, groundwater flows. Further, the submission does not describe how any impacts associated with flooding the underground with saline water will be mitigated (e.g., no flooding of permafrost zones).

Recommendation:

(IR-05) CIRNAC recommends that Agnico Eagle provide additional details on the flooding of the mine with increased volumes saline water, with an emphasis on potential impacts and mitigations.

6. Watershed area update in the Water Balance Water Quality Model

Comment:

CIRNAC's review of the Water Balance Water Quality Model report noted that Figures 3-9 and 3-10 both show the area northwest of the tailings storage facility (TSF) as being characterized as SP6-Natural. Appendix A-2 Table of Annual Catchment Areas shows that the SP6 catchment area is reduced from 1,099,515 m² in 2025 to 600,772 m² in 2026, but it is not apparent where the approximate 500,000 m² removed from SP6 have been assigned in the Catchment Area Table.

Review of Figures A1.1 through to A1.11 identify the former SP6 area as CP8 Pond-TSF, however there is no reference to that water balance catchment area in Appendix A-2 Table of Annual Catchment Areas. Given that the tailings area will double in size, and runoff, seepage, and dust generation and disbursement will all be increased in this area, it is important that this area be properly characterized in the model.

Recommendation:

(IR-06) CIRNAC recommends that Agnico Eagle:

- a. Review the areas associated with the proposed expanded TSF area;
- b. Assess if model revisions are needed to reflect the CP8 Pond-TSF catchment area or if the actual model already calculates results using the CP8 Pond-TSF catchment area properly; and
- c. Explain how CP8 Pond-TSF catchment is captured in the model if new calculations are accurate, or if revisions are needed, provide updated information so the site may be assessed during the amendment review.



7. Annual discharge volumes to Itivia Harbour

Comment:

Table 5-2 in the Water Balance and Water Quality Model indicates that the annual discharge volume to Itivia Harbour during operations for the current prediction is 20.1 million m³ per year. Based on a maximum waterline throughput of 20,000 m³ per day, this would require 1,000 days of discharge per year. On this basis, CIRNAC assumes that the stated discharge volumes are in error. Furthermore, the reported % changes presented in Table 5-2 are incorrect.

Recommendation:

(IR-07) CIRNAC recommends that Agnico Eagle:

- a. Correct the annual discharge volumes to Itivia Harbour presented in the Water Balance and Water Quality Model; and
- b. Discuss where the error occurred and its effects on the model results.

8. Sludge management during and after TIRI02 dewatering

Comment:

Section 3.10.4.3 of the Water Management Plan (Appendix 5R) describes the current practise of disposing of Effluent Water Treatment Plant sludge in TIRI02. A significant change to the dewatering of TIRI02 was introduced in the 2025 Annual Report, with initiation of saline water transfer to WES02 over a two-year period starting in 2027. It is not clear what sludge disposal practices will be implemented during or after TIRI02 saline water discharge.

Recommendation:

(IR-08) CIRNAC recommends that Agnico Eagle provide details on changes to sludge management and disposal practices that will occur as a result of dewatering TIRI02 and use of WES02 for saline water storage.

9. Additional freshwater requirement

Comment:

Sections 1.2 and 3.3.7.1.1 of the Main Application document specify Agnico Eagle is asking for an increase in freshwater withdrawal from 1,100,296 m³/yr to 1,112,296 m³/yr, an increase of 12,000 m³/yr identified for Camp Water Use.



No changes to camp operation or any other water use were found in the application document to explain the need for additional freshwater withdrawal. The current authorized water withdrawal quantity includes a 20% contingency of 183,383 m³/year, ~15 times greater than the increase requested. It is not clear why this contingency could not be used for the additional need. Furthermore, though the annual water withdrawal from station MEL-11 on Meliadine Lake has been increasing year over year for the last 5 years, in 2025 it was only ~53% of the total authorized volume.

Recommendation:

(IR-09) CIRNAC recommends that Agnico Eagle:

- a. Describe changes to operations that will require greater freshwater withdrawals from Meliadine Lake; and
- b. Justify why the small water volume increase requested cannot be taken from the contingency in the currently authorized water volume.

10. Commitment to eliminate discharge to Meliadine Lake

Comment:

In Section 4.3.1 of the Main Application document, Agnico Eagle states that “*Average annual discharge rates to Meliadine Lake are approximately 0.58 million m³/year*” and that “*Consistent with the Adaptive Management Plan, discharges to Meliadine Lake will be minimized to the extent practicable through use of the waterline, where operationally feasible.*”

CIRNAC notes that the discharge of on average 580 000 m³/year of contact water discharge to Meliadine Lake does not fully reflect Agnico Eagle’s commitment during the 2024 review of the Adaptive Management Plan, in which they committed to the Kivalliq Inuit Association that they would eliminate discharge of contact water to Meliadine Lake once the waterline was operational.

Recommendation:

(IR-10) CIRNAC recommends that Agnico Eagle review its distribution of waterline input, or other options, to further reduce or eliminate the ~580 000 m³/year annual discharge to Meliadine Lake currently proposed.



11. Tailings volume clarification

Comment:

The Application Form (Part 15), the Main Application Document (Table 1.2-1), the ARD-ML Sampling and Testing Plan (Appendix 5B) (Section 3.3.4, Table 2.2), and the Mine Waste Management Plan (Appendix 5L) (Section 4.1.1, Table 4-1) all state 45 Mt of tailings will be generated over the life-of-mine, of which 37 Mt will be placed in the TSF and 7 Mt will be placed underground. The sum of the tailings placed in the TSF and placed underground (44 Mt) do not add up to the total tailings (45 Mt). It is not apparent why there is a discrepancy.

Recommendation:

(IR-11) CIRNAC recommends that Agnico Eagle clarify why there is a 1 Mt difference between total tailings generated and the sum of tailings placed in the TSF and underground.

12. Temporary tailings storage

Comment:

The Application Form and Main Application Document request that the licence be amended to include construction and operation of a temporary filtered tailings storage area of 40 m by 40 m immediately adjacent to the internal filtered tailings storage area, as shown in Figure 3.3.1 of the Main Application Document. This storage area is only to be used under upset conditions such as during prolonged (> 48 h) blizzard events when tailings extraction and hauling are restricted (e.g., also during caribou migration work suspension protocol).

Agnico Eagle indicates that the new storage pad will be engineered and lined, with access restrictions, dust suppression, and wind-control measures implemented as required. Material stored on the pad will be removed as soon as operationally feasible once upset conditions resolve. Agnico Eagle notes that this interim extension has been previously requested and approved each year through the modification process.

In addition to the new pad, Agnico Eagle indicates that post-storage handling of material temporarily stored on the external pad may subsequently be managed through one or more of the following pathways, depending on operational, geotechnical, and environmental considerations:

- 1) Placed and compacted on the TSF, subject to geotechnical approval and material condition (e.g., frozen or snow-contaminated);
- 2) Transported underground to be used as backfill, which would require a new and distinct transit pad within the confines of the Portal 2 Ore Pad (Figure 3.3-2);
- 3) Temporary placement on an inactive TSF cell to allow thawing prior to final placement and compaction; or



- 4) Temporary storage in a designated area near the filter press tailings storage facility (referred to as the Church), potentially the low-lying area between the Church and the TSF highlighted in Figure 3.3-3, to allow material to thaw prior to final disposition on the TSF in the summer.

CIRNAC notes that no information is provided that describes the nature of the areas associated with bullets 2, 3, and 4 nor how these would be prepared for handling temporary tailings storage and contact water runoff.

Recommendation:

(IR-12) CIRNAC recommends that Agnico Eagle:

- a. Provide information/records related to prior modification requests and approvals for this temporary storage facility;
- b. Provide storage capacity, pad designs and operational details for subsequent post-storage handling of tailings that are stored in temporary storage areas; and
- c. Clarify why approval is not being requested for the post-storage handling facilities.

13. Temporary ore storage next to portals

Comment:

Section 3.3.3 of the Main Application Document states that “*As outlined in the 2024 WL Amendment (Agnico Eagle 2024), temporary ore stockpiles will be located near underground portals.*” CIRNAC did not find a reference to ore stockpiles near the portals as part of the 2024 Licence Amendment Main Application Document, which instead stated “*For this Water Licence Amendment Application, there will be new temporary ore stockpiles adjacent to the pits at Pump, F Zone, and Discovery.*” Neither the Main Application Document nor the Ore Storage Management Plan (Appendix 5M) provide any details on the location and design of the newly proposed temporary ore storage facilities.

Recommendation:

(IR-13) CIRNAC recommends that Agnico Eagle:

- a. Provide site plans/figures that clearly identify the locations of the temporary ore storage areas next to portals; and
- b. Provide information on the general design approach for each of the temporary ore storage areas (e.g are they lined, how will runoff be managed, what will happen if they are no longer in use at that specific location, etc).



14. Tailings storage facility - remaining capacity and expansion

Comment:

The Main Application Document Table 1.2-1 states that the scope of activities for the 2026 amendment includes “*Increase in tailings to the Tailings Storage Facility, within assessed amount*” to 37 Mt. However, no discussion or details on timing or schedule of expansion of the current design capacity of the tailings storage facility was provided.

Table 4-1 of the Mine Waste Management Plan shows that at the end of 2025 Agnico Eagle plans for eleven more years of tailings deposition to the TSF. This will require additional storage of approximately 27.6 Mt, of which 1,997,067 t of tailings are planned to be dry stacked in 2026. In Section 4.4.1 of the 2025 Annual Report, it is noted the remaining facility design capacity at the end of 2025 was 654,000 m³ (1,079,000 t) which falls short (by 918,067 t) of the 2026 tailings storage requirement. As such it appears critical that expansion of the tailing storage faculty be undertaken as early as possible.

Recommendation:

(IR-14) CIRNAC recommends that Agnico Eagle provide:

- a. A summary discussion of its plans for expanding the approved TSF capacity to full life of mine tailings deposition capacity;
- b. Contingency storage availability; and
- c. The schedule for tailings storage expansion given the limited remaining capacity of approximately 654,000 m³ at the end of 2025 and significant additional capacity requirement.