



August 07, 2026

NWB File No.: 2AM-MEL1631

Robert Hunter
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0B 1J0

**Re: Response to Comments to 2AM-MEL1631 Water Licence Amendment – Operational Update
– Information Requests / Completeness Check**

Dear Mr. Hunter

Agnico Eagle thanks the Kivalliq Inuit Association, Crown-Indigenous Relations and Northern Affairs Canada, Environment and Climate Change Canada, and Fisheries and Oceans Canada for their comments and review on the Meliadine Mine Water Licence Amendment Application. Our responses are provided in the enclosed.

Based on the information requests and responses provided, Agnico Eagle is of the opinion that the process can move to the technical review phase, and would look forward to a Technical Meeting in Rankin Inlet in late October 2026.

Should you have any questions or require further information, please contact the undersigned at your convenience.

Regards,

Colleen Prather
colleen.prather@agnicoeagle.com
Superintendent, Permitting & Regulatory Affairs

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KIVALLIQ INUIT ASSOCIATION (KivIA)

Interested Party:	KivIA	Rec No.:	KivIA-IR-1
Re:	Effects of traffic		

Request Made by Interested Party:

a) Please provide the number of trips, return, for the increased fuel tanker traffic for the period of 2026-2036. This should be compared to the predicted traffic levels from the 2014 FEIS.

b) Please provide the number of trips, return, for the increased passenger vans/buses and transport trucks for the period 2026-2036. This should be compared to the to the predicted traffic levels from the 2014 FEIS.

c) Please provide details of how fuel trips will be scheduled between sea lift and caribou migration seasons and options for scheduling workforce shift changes during caribou migrations in the event of AWAR closures.

Agnico Eagle's Response to Request:

Response to bullet a):

The 2014 FEIS, as summarized in Table 6-1 of the Roads Management Plan (Appendix 5-P), predicted approximately 8 round-trips per day by fuel trucks of 45,000 L capacity (equal to 5,840 one-way trips per year). Agnico Eagle does not expect to exceed the 2014 FEIS estimate of 5,840 one-way trips for fuel transport, even with the additional storage of fuel. For comparison, in 2025, traffic associated with fuel transport consisted of 2,909 one-way trips by fuel tankers (40,000 L) and 443 one-way trips by fuel trucks (15,000 L), for a total of 3,352 one-way fuel transport trips (Appendix 25 of the 2025 NWB Annual Report).

To provide context for this Application, the number of fuel transport trips can also be expressed in terms of fuel delivery capacity, noting that each tanker or truck has sufficient capacity to fully load the proposed storage tanks (e.g., total capacity of 20 ML onsite).

2014 FEIS Predictions	Current (2025) AWAR Monitoring
- Fuel Trucks: 5840/2 round trips x 45,000 L = 131.4 ML	- Fuel Tankers: 2909/2 round trips x 40,000 L = 58 ML - Fuel Trucks: 443/2 round trips x 15,000 L = 3.3 ML TOTAL = 61.5 ML

Response to bullet b):

As described in the Roads Management Plan, traffic volumes on the AWAR are expected to remain generally consistent with those assessed in the 2014 FEIS. The proposed Operational Update primarily extends the mine life and does not materially increase the intensity of operations or associated passenger road traffic. Accordingly, current estimates remain consistent with the FEIS projections for passenger van/buses in Table 6-1 of the Roads Management Plan (Appendix 5-P of the Application).

Response to bullet c):

Fuel deliveries will continue to be managed through existing logistics planning and coordinated with caribou migration mitigation measures. The proposed increase in fuel storage capacity provides additional flexibility to maintain on-site fuel inventories during periods of temporary AWAR restrictions. In the event of AWAR closures during caribou migration, Agnico Eagle will continue to implement the TEMMP and associated road closure protocols. Operational contingencies may include adjusting delivery schedules, relying on on-site inventories, and modifying workforce transportation schedules as required. As the Operational Update primarily extends mine life and does not materially increase the intensity of operations, no changes to existing fuel delivery or workforce transportation practices are being proposed.

Interested Party:	KivIA	Rec No.:	KivIA-IR-2
Re:	Final storage location on site for the composted organic waste		

Request Made by Interested Party:

There doesn't appear to be a location provided for the final disposure location of composted organic waste on site. Can the Proponent please provide where the composted organic waste will end up being disposed off on site.

Agnico Eagle's Response to Request:

As provided in Section 5.4.1 of Appendix 5-H of the Application, as well as block 15 of the Application Form, composted waste will go to the landfill.

Interested Party:	KivIA	Rec No.:	KivIA-IR-3
Re:	Tailings Management		

Request Made by Interested Party:

a) Provide the plan for controlling the surface run-off and surface seepage from the transit pad for tailings to be hauled underground that is located within the Portal 2 Ore Pad.

b) Provide the plan for controlling the surface run-off and surface seepage from the areas where frozen tailings material will be stored to thaw prior to final deposition on the TSF

Agnico Eagle's Response to Request:**Response to bullet a):**

Agnico Eagle clarifies that Figure 3.3-2 is intended to illustrate the extent of the transit pad within the Portal 2 Ore Pad should underground back-hauling be selected as a post-handling option for tailings temporarily stored on the Interim Extension Tailings Storage Pad. As described in Section 3.3.4, all post-handling options remain under evaluation, and no final design has been developed or selected at this time. A detailed design report will be submitted for review at least 60 days prior to any updates to the TSF design.

Response to bullet b):

Similarly, the area shown in Figure 3.3-3 represents a potential location for the temporary storage of frozen tailings material to allow thawing prior to final disposition in the TSF. Again, it is one potential option currently under evaluation. A detailed design report will be submitted for review at least 60 days prior to any updates to the TSF design.

Interested Party:	KivIA	Rec No.:	KivIA-IR-4
Re:	Interim Tailings Storage Pad		

Request Made by Interested Party:

The Proponent should provide the following:

- a) What is the capacity transit pad in terms of number of days of average mill production?*
- b) Will the transit pad be constructed with visual shielding using double sea can walls?*
- c) Explain how the transit pad activity will be monitored such as with a remote camera?*

Agnico Eagle's Response to Request:

Response to bullet a):

The Interim Tailings Storage Pad is intended as a temporary contingency measure during defined upset operating conditions and is not intended for long-term tailings storage. The use of the pad is not expected to result in an increase in surface vehicle activity. Rather, the pad would only be utilized when the mill continues to operate but normal transportation of filtered tailings between the Tailings Storage Building and the TSF is temporarily suspended (e.g., during prolonged blizzard events or caribou migration shutdown protocols). Under these circumstances, the pad would provide temporary storage for tailings that would otherwise have been transported to the TSF.

Response to bullet b):

Prior to use, suitable containment measures (e.g., sea cans, rock berm, etc.) will be implemented to ensure tailings are retained within the designated storage area and to minimize access by caribou. Type of containment may vary depending on the location of the interim pad; as noted in response to KivIA-IR-3, a detailed design report will be submitted for review at least 60 days prior to any updates to the TSF design.

Response to bullet c):

The Interim Tailings Storage Pad will be monitored through both operator presence and remote monitoring. When the pad is in use, operators will be actively transporting and placing tailings on the pad, and remote cameras may be used as needed to supplement monitoring.

Interested Party:	KivIA	Rec No.:	KivIA-IR-5
Re:	Increased Water Use from approved water sources		

Request Made by Interested Party:

a) Based on the increased production per annum please provide the freshwater consumption needs for the mill during the period of 2026-2036.

b) Based on the increased traffic per annum please provide the freshwater consumption needs for dust control of these activities for the period of 2026-2036.

c) Based on the increased open pit activity please provide the freshwater consumption needs for dust control of these activities for the period of 2026-2036.

Agnico Eagle's Response to Request:

Response to bullet a):

There will be no increase in annual production as part of this Amendment (Section 3.3.1 of the Main Application Document). The existing mill will continue to operate within its approved capacity limits. Table 3.2 from the Ore Management Plan (Appendix 5-M) is the total ore mined. Ore mined in excess of annual processing capacity will be stockpiled and managed in accordance with the Ore Management Plan for processing in future years. Freshwater requirements for the mill during the 2026–2036 period remain unchanged at approximately 652,000 m³/year, based on an average water demand of 0.21 m³ per tonne of ore processed.

Response to bullet b):

As described in the Roads Management Plan (Appendix 5-P of the Application), projected traffic volumes associated with the proposed Operational Update remain generally consistent with those assessed in the 2014 FEIS. The Operational Update primarily extends the duration of operations rather than increasing annual operational intensity. As a result, freshwater requirements for road dust suppression are expected to remain comparable to current operational demands, with no significant increase anticipated.

Response to bullet c):

The Operational Update primarily extends Pump Underground mining and does not materially increase open pit mining activity relative to what is currently approved. As a result, freshwater requirements for open pit dust suppression are expected to remain generally consistent with current operational demands between 2026 and 2036. Accordingly, no significant increase in freshwater consumption for dust control is anticipated.

Interested Party:	KivIA	Rec No.:	KivIA-IR-6
Re:	Mill Capacity Expansion and Duration of Additional Milling Beyond 2036		

Request Made by Interested Party:

- a) Based on the increased production per annum please provide information on the possibility of a Mill Expansion.*
- b) Based on the year end stockpile for 2036 of 6,036,061, how many additional years of milling would be required beyond the end of mine life in 2036.*
- c) Additional years of milling beyond the end of mine life in 2036 would require that the Closure and Post-Closure timelines be modified. Please provide reasonable estimates of changes to the periods of time for the Closure and Post-Closure activities*

Agnico Eagle's Response to Request:

Response to bullet a):

There will be no increase in annual production as part of this Amendment (Section 3.3.1 of the Main Application Document).

Response to bullet b):

As noted in the Ore Management Plan (Section 4), the intent is to mill all ore from the stockpiles with no ore stockpiles remaining at closure. Agnico Eagle will continue to report on the stockpile remaining at year end in each annual report. Information provided in the application was based on a likely mine plan, but this will continue to be refined through annual operations. If any ore remains after 2036, the treatment of this stockpiled ore and any potential extension of operations beyond 2036 will be evaluated as part of future mine planning and regulatory processes.

Response to bullet c):

Should milling continue beyond 2036 to process the remaining ore stockpile the overall duration of the Closure (7 years) and Post-Closure (10 years) periods is not expected to change; the schedule would be shifted accordingly.

Interested Party:	KivIA	Rec No.:	KivIA-IR-7
Re:	Costs of Saline Water treatment		

Request Made by Interested Party:

In order to evaluate the potential liabilities of increased saline storage on site, the KivIA would require the estimated cost to treat one cubic metre of saline water prior to discharge to Itivia Harbour. Please provide the estimate per cubic metre cost of treating the saline water on site.

Agnico Eagle's Response to Request:

Agnico Eagle estimates the cost to treat one cubic metre of saline water prior to discharge to Itivia Harbour is approximately \$2.06/m³.

Interested Party:	KivIA	Rec No.:	KivIA-IR-8
Re:	Costs of Saline Water treatment		

Request Made by Interested Party:

a) Is the capacity of the saline waterline sufficient to allow discharge from the prioritized contact water sources with the additional underground workings?

b) At the maximum inflow scenario, is the current infrastructure and management plans sufficient to ensure discharge to Meliadine Lake is minimized, and the higher-impact contact water sources are discharged to Itivia Harbour?

Agnico Eagle's Response to Request:

Response to bullet a):

Yes, the capacity of the waterline is sufficient to support saline water management associated with the additional underground workings. Supporting hydrogeological modelling (Appendix 5-F of the Application), which incorporates conservative assumptions, indicates that the saline waterline has sufficient capacity to manage the additional inflows associated with the full Pump Underground development.

Response to bullet b):

Current infrastructure and management plans are sufficient to manage the full range of projected water volumes. The water management strategy is supported by conservative groundwater inflow predictions from the updated hydrogeological model. Agnico Eagle remains committed to minimizing and/or eliminating discharges to Meliadine Lake and adhering to Water Licence Condition Part F, Item 4, while continuing to manage water in accordance with the approved Adaptive Management Plan.

CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC)

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-01
Re:	Updated security estimate		

Request Made by Interested Party:

CIRNAC recommends that Agnico Eagle provide their revised security estimate as part of this completeness review stage.

Agnico Eagle's Response to Request:

The security estimate is not required as part of the completeness review stage. As per standard Water Licence Amendment processes, Agnico Eagle reiterates that reclamation security will be reviewed with CIRNAC and the KivIA throughout the Amendment process, to be finalized prior to the Public Hearing.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-02
Re:	Saline water management		

Request Made by Interested Party:

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.*

Agnico Eagle's Response to Request:

Response to bullet a):

Agnico Eagle clarifies the following time period and phase of operation for the following groundwater/saline water management, consistent with the Groundwater Management Plan (Appendix 5-F), Water Management Plan (Appendix 5-R), and Water Balance and Water Quality Model (Appendix 4-C). Agnico Eagle intends on implementing the long-term strategy as soon as the waterline is available.

- i. **Short-Term to Medium-Term (when waterline not available):** Saline contact water from the Underground Mine will continue to be contained in underground sumps and reused for mining operations. Excess saline contact water will be stored in TIRI02 Pit, PUMP02 Pit, and WES02 pit as required.
- ii. **Long-Term (waterline available):** Saline contact water from the underground mine will continue to be collected in underground sumps and reused in mining operations where practicable. Once the waterline is commissioned and operational, saline water will be discharged to Itivia Harbour during the open-water season. The PUMP02 and WES02 pits will continue to provide storage capacity, as required, to support ongoing saline water management.

Response to bullet b):

Agnico Eagle clarifies that the reference to trucking saline water to Itivia Harbour as the long-term management strategy was a typo in the Main Application Document in Section 4.2.2, the long-term strategy remains that the waterline would be utilized. The short-term management strategy is to store saline water in TIRI02, while the medium-term strategy is to utilize the mined-out PUMP02 and WES02 pits as additional storage capacity. The long-term management strategy remains the discharge of saline water to Itivia Harbour via the approved waterline system. This approach is consistent with the

Groundwater Management Plan (Appendix 5-F), Water Management Plan (Appendix 5-R), and Water Balance and Water Quality Model (Appendix 4-C).

Response to bullet c):

Agnico Eagle is still actively refining the design of the ammonia management option to align with the latest Metal and Diamond Mining Effluent Regulations (MDMER) requirements. The requested information would be provided as part of the 60-days notice.

Response to bullet d):

On June 17, 2026, [amendments to the Metal and Diamond Mining Effluent Regulations \(MDMER\)](#) were published, including revisions to the *Acartia tonsa* acute lethality testing requirements for a period of 10 years. Under the revised Section 4.2, of the amended Regulation, if an effluent sample fails the *Acartia tonsa* test (>50% die in 100% effluent), it does not affect the mine's, authority to deposit under Section 4 of the Regulation, provided no other acute lethality test indicates acute lethality. Agnico Eagle will continue to conduct *Acartia tonsa* testing and report results to ECCC, as required. This amendment will enable Agnico Eagle to initiate marine discharge of saline water as planned in accordance with the Water Management Plan (Appendix 5-R).

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-03
Re:	Extension of mining depth at Pump deposit		

Request Made by Interested Party:

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

Agnico Eagle's Response to Request:

Agnico Eagle confirms that Pump underground, similar to Tiriganiaq underground, will extend below the base of permafrost. Thermal and hydrogeological studies were completed to model the expected mine inflow within and below the permafrost area (Appendix 4-A and 4-B).

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-04
Re:	Predicted groundwater inflows to Tiriganiaq underground		

Request Made by Interested Party:

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.*

Agnico Eagle's Response to Request:

Table 2 of the Groundwater Management Plan (Appendix 5-F of the Application) presents:

1. model results for day-to-day operations planning named the "Realistic Model" (ending in 2031), which are also presented in the annual report; and
2. a conservative model for future mine planning, the "Upper-bound" model (ending in 2036).

Agnico Eagle confirms that the "Upper-bound" predictions in Table 2 of the Groundwater Management Plan (Appendix 5-F) are the same "Base Case" predictions provided in Table 2 of the Groundwater model report (Appendix 4-B); these are considered as conservative model predictions. The comparison between the "Realistic Model" and "Conservative Model" results in the Groundwater Management Plan was intended to demonstrate that Agnico Eagle's groundwater management measures have been designed with substantial contingency. The "Conservative Model" results were adopted as the basis for the site water balance model including the sizing of key water management infrastructure, such as the dewatering pumps and storage ponds (Water Balance Model, Table 3-7).

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-05
Re:	Flooding of underground mines with saline water at closure		

Request Made by Interested Party:

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.

Agnico Eagle's Response to Request:

The intent has always been to flood the underground mine as part of closure. From the baseline Hydrogeological studies submitted in Volume 7 of the 2014 FEIS: "At closure, brine from the treatment process will be pumped back into the planned underground mine. In addition, saline water will continue to flow into the underground mine through the bedrock located both below the unfrozen portions of the permafrost (the cryopeg) and the permafrost zone itself. Both of these sources of water will flow (density driven) down to the deep part of the mine and flood voids in backfilled and open development areas and stopes. The brine is estimated to fill approximately one-sixth of the mine below the top of the cryopeg. The water level in the underground will continue to gradually rise due to natural saline groundwater inflow".

Furthermore, from the previous hydrogeological model for closure, submitted with the 2024 Water Licence amendment (Appendix E7 of the 2024 Water Licence Amendment application), it is assumed that the permafrost is fully degraded below all flooded pits holding water such that each lake would be connected to the regional groundwater flow system.

Additional saline water volumes will follow the same mechanics as described above, resulting in similar environmental impacts as previously assessed.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-06
Re:	Watershed area update in the Water Balance Water Quality Model		

Request Made by Interested Party:

CIRNAC recommends that Agnico Eagle:

- Review the areas associated with the proposed expanded TSF area;*
- 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*
- 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.*

Agnico Eagle's Response to Request:

Agnico Eagle has reviewed the "SP6-Natural" and "CP8 Pond-TSF" catchment areas in the Water Balance and Water Quality Model and confirms they are appropriately represented. Figures 3-9 and 3-10 depict site conditions in 2025 and 2026, respectively, and were used to calibrate the model. In accordance to the area defined in the Design Report (Tetra-Tech 2026) to expand the existing TSF from 10.92 Mt to 31 Mt (capacity in the current water licence), the TSF will overprint most of the existing "SP6-Natural" catchment area. This area is labelled "CP8 Pond-TSF" because runoff from that portion of the TSF is collected and directed to Collection Pond 8 (CP8).

References:

Tetra-Tech. 2026. Tailings Storage Facility (TSF) Design Update Report Meliadine Gold Mine, Nunavut, Revision 01, April 2026. Available on the NWB Registry: <https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MEL1631%20Agnico/3%20TECH/D%20CONSTRUCTION/TSF%20Update%20Design%20Report/260415%202AM-MEL1631%20Detailed%20Design%20Report-IFU%20Revision%2001-IMLE.pdf>

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-07
Re:	Annual discharge volumes to Itivia Harbour		

Request Made by Interested Party:

CIRNAC recommends that Agnico Eagle:

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

Agnico Eagle's Response to Request:

Agnico Eagle confirms that the discharges are correct in the Water Balance and Water Quality Model (Appendix 4-C). The 20.1 million m³ total discharge to Itivia Harbour is for the entire Operations period, which was indicated as a footnote in Table 5-2:

Table 5-2:
Annual Discharge Volumes and Sources

Discharge Metric	Phase	2025 Modification ¹	Current Prediction ²	Percent Change
		m ³		
Saline Discharge to Itivia Harbour	Operations	5,301,984	4,953,236	-2%
EWTP (Contact Water) to Itivia Harbour	Operations	9,452,000	15,199,453	38%
Total Discharge to Itivia Harbour	Operations	12,024,097	20,152,689	40%
EWTP (Contact Water) to Meliadine Lake	Operations	3,736,372	6,181,028	41%
Total Discharge (Saline + Contact Water)	Operations	15,760,469	26,282,717	40%
Total Discharge (Saline + Contact Water)	Operations + Closure	19,972,715	26,196,098	24%

Note:

¹ Total discharge volumes calculated for the 2025-2031 period.

² Total discharge volumes calculated for the 2026-2036 period.

As stated in Appendix 4-C, Section 5.1 (page 5-1), discharges to Itivia Harbour are predicted to be **1.97 Mm³** per year while the Waterline is in operation with 0.45 Mm³ per year on average comprised of saline water and 1.52 Mm³ per year comprised of surface contact water (Figure 5-1 and Table 5-1).

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-08
Re:	Sludge management during and after TIRI02 dewatering		

Request Made by Interested Party:

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.

Agnico Eagle's Response to Request:

Dewatering of TIRI02 and the use of WES02 for saline water storage are not expected to substantially change sludge management practices. Once TIRI02 is no longer required for saline water storage, sludge from the WTC will be transferred to WES02. As documented in the 2025 NWB Annual Report, based on EWTP-WTC sludge water quality analysis from 2021 to 2025, Agnico Eagle concludes that the discharge of EWTP-WTC sludge has a limited and manageable effect on water quality in TIRI02 (Section 7.3.3 of 2025 NWB Annual Report). Sludge generated by the SETP-WTC TSS treatment system is expected to have similar characteristics, and therefore similar performance is anticipated at WES02.

References:

Agnico Eagle. 2026. 2025 NWB Annual Report, March 2026. Available on the NWB Registry:
<https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MEL1631%20Agnico/3%20TECH/B%20GENERAL/2%20ANNUAL%20RPT/2025%20Annual%20Report%20%26%20Appendices/260401%202AM-MEL1631%20Meliadine%20Gold%20Mine%202025%20Annual%20Report-IMLE.pdf>

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-09
Re:	Sludge management during and after TIRI02 dewatering		

Request Made by Interested Party:

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.*

Agnico Eagle's Response to Request:**Response to bullet a):**

Agnico Eagle forecasts that camp capacity could peak up to 900 people (previously 800 people) at a given time. This is stated in the Water Management Plan (Appendix 5-R), Section 5.3.6. The additional 10,000 m³/year was calculated based on a consumption rate of 250 L/day per person, plus an additional 2,000 m³/year resulting from the updated contingency volume calculation.

Response to bullet b):

The contingency volume in the current Water Licence was established to address variability and unforeseen conditions within the existing licensed scope of operations. Allocating this contingency for camp use would reduce the operational buffer available for current activities.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-10
Re:	Commitment to eliminate discharge to Meliadine Lake		

Request Made by Interested Party:

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.

Agnico Eagle's Response to Request:

Agnico Eagle engaged with the Kivalliq Inuit Association to review the Water Balance Water Quality Model (WBWQM) results for this Water Licence Amendment (prior to the submission to the NWB), with full consideration of the Adaptive Management Plan commitment that *"Agnico Eagle shall minimize or eliminate surface contact water discharges to Meliadine Lake by discharging on-site surface contact water in accordance with the Groundwater Management Plan and/or Adaptive Management Plan."* The WBWQM included with this application also considered Part F, Item 4 of Water Licence 2AM-MEL1631, which requires discharges from the Final Discharge Point (MEL-14) to Meliadine Lake to be minimized to the greatest extent practicable and not exceed the authorized annual volume of 2.6 million m³.

The model results indicate that predicted discharges to Meliadine Lake remain consistent with those presented in the 2025 Modification Application (see figure below, Appendix 4-C). Also described throughout the Water Management Plan (Appendix 5-R) and WBWQM (Appendix 4-C), the objective is to minimize discharges to Meliadine Lake by optimizing discharge of surface contact water via the Waterline to Itivia Harbour; however, the primary purpose of the waterline is for discharge of saline water to the marine environment with the intent to reduce the inventory to zero (or near zero) by the end of the open-water season (or by the end of the yearly operational window of the waterline).

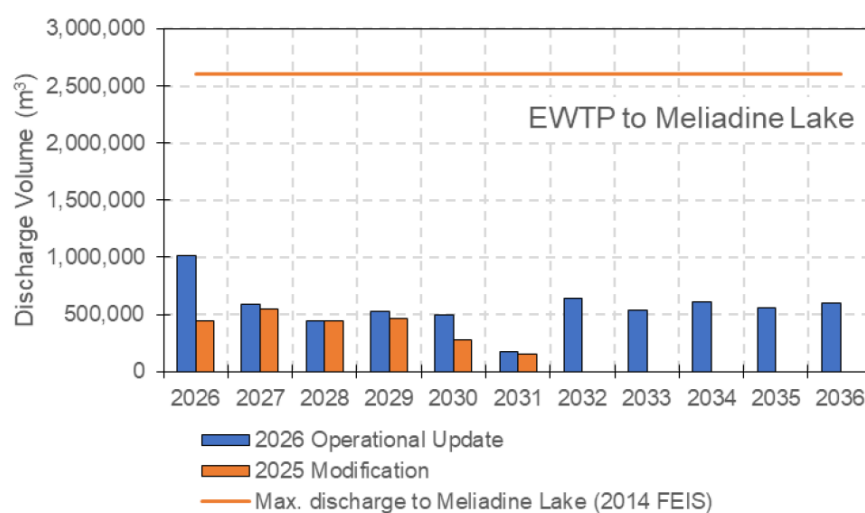


Figure 5-4: Annual EWTP discharges to Meliadine Lake. Maximum allowable annual discharge volume shown by orange line.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-11
Re:	Tailings volume clarification		

Request Made by Interested Party:

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.

Agnico Eagle's Response to Request:

Agnico Eagle clarifies that the apparent 1 Mt discrepancy results from rounding. Forecasted tailings deposition is 37,442,056 tonnes to the TSF (rounded to 37 Mt) and 6,515,017 tonnes underground (rounded to 7 Mt).

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-12
Re:	Temporary tailings storage		

Request Made by Interested Party:

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.*

Agnico Eagle's Response to Request:

Response to bullet a):

In 2023, Agnico Eagle first approached the NWB for the use of a temporary tailings storage pad as additional storage for dry tailings during the caribou migration. The implementation of a temporary pad was required for the migration, based on caribou migration work suspension protocols. The 2023 submission and approval from NWB for the Temporary Tailings Storage Pad is provided on the [NWB registry](#).

Agnico Eagle again requested the temporary tailings storage pad for use during the caribou migration in 2024, [2025](#), and [2026](#).

Response to bullets b) & c):

As stated in Section 3.3.4 of the Main Application Document, all post-storage options are still under evaluation. A detailed design report will be submitted at least 60 days prior to any option selected for approval. See also response to **KivIA-IR-4**.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-13
Re:	Temporary ore storage next to portals		

Request Made by Interested Party:

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).*

Agnico Eagle's Response to Request:

Response to bullet a):

There is no change to the scope of this activity from that previously authorized under the current Water Licence. The reference to the 2024 Water Licence Amendment was intended to indicate that no changes to ore stockpile management are proposed as part of this amendment. As described in the Ore Storage Management Plan (Appendix 5-M), temporary ore stockpiles adjacent to the Pump, F Zone, and Discovery pits are used to facilitate ore handling and improve operational efficiency by enabling the use of larger haulage equipment for transporting ore over longer distances to the mill.

Response to bullet b):

The ore stockpiles are temporary operational facilities. Runoff from the stockpile areas is captured within the site's water management infrastructure and ultimately reports to Contact Pond 1 (CP1), where it is treated at the Effluent Water Treatment Plant (EWTP) prior to discharge in accordance with the Water Management Plan. When a stockpile area is no longer required, the ore will be removed. No temporary ore stockpiles will remain at closure.

Interested Party:	CIRNAC	Rec No.:	CIRNAC-IR-14
Re:	Tailings storage facility - remaining capacity and expansion		

Request Made by Interested Party:

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.*

Agnico Eagle's Response to Request:

The Design Report (Tetra-Tech 2026) to expand the existing TSF from 10.92 Mt to 31 Mt (capacity in the current water licence) was submitted for review on May 12, 2026 and approved by the NWB on June 23, 2026. Consistent with this process, a detailed design report for any future expansion of the TSF from 31 Mt to 37 Mt will be submitted to the NWB for review and approval at least 60 days prior to implementation.

References:

Tetra-Tech. 2026. Tailings Storage Facility (TSF) Design Update Report Meliadine Gold Mine, Nunavut, Revision 01, April 2026. Available on the NWB Registry: <https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MEL1631%20Agnico/3%20TECH/D%20CONSTRUCTION/TSF%20Update%20Design%20Report/260415%202AM-MEL1631%20Detailed%20Design%20Report-IFU%20Revision%2001-IMLE.pdf>

ENVIRONMENT AND CLIMATE CHANGE CANADA (ECCC)

Interested Party:	ECCC	Rec No.:	ECCC-IR-01
Re:	Interim Extension Tailings Storage Pad		

Request Made by Interested Party:

ECCC requests that the Proponent:

- *clarify the conditions under which the extension storage pad may be needed, and how long the tailings are expected to be stored there; and*
- *provide additional information regarding the construction and containment of the extension storage pad and the additional proposed temporary storage area (proposed as an option for relocation of tailings from the extension storage pad), including any vertical containment features (in addition to the seacan), water management, dust suppression and monitoring.*

Agnico Eagle's Response to Request:

Response to bullet 1):

As described in the Main Application Document and the Mine Waste Management Plan (Appendix 5-L), the extension storage pad would be used only during temporary upset operating conditions when the tailings storage building (Church) capacity is reached or forecasted to be exceeded and normal tailings handling routes (i.e., deposition on the TSF) are unavailable. Such conditions may include prolonged blizzard events (>48 hours), safety-related suspension of tailings haulage to the TSF, caribou migration constraints, or temporary limitations affecting tailings transport or deposition. The pad is not intended for long-term storage; tailings would be removed and deposited in the TSF at the earliest practicable opportunity once normal operations resume.

Response to bullet 2):

The extension storage pad will be engineered and lined. As stated in the Main Application Document:

Post-storage handling (all options are still under evaluation) 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:

- *Placed and compacted on the TSF, subject to geotechnical approval and material condition (e.g., frozen or snow-contaminated);*
- *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);*
- *Temporary placement on an inactive TSF cell to allow thawing prior to final placement and compaction; or*
- *Temporary storage in a designated area near 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.*

As described in the Mine Waste Management Plan (Appendix 5-L), runoff from the temporary storage pad is captured within the site's water management infrastructure and eventually reports to CP1. Dust suppression measures will be applied as necessary (e.g., spraying water) and suitable containment features (e.g., seacans, rock berm, etc.) will be established prior to use to ensure tailings remain within the designated storage area. Type of containment may vary depending on the location of the interim pad; as noted in response to KivIA-IR-3, a detailed design report will be submitted for review at least 60 days prior to any updates to the TSF design. The tailings management area is subject to routine monitoring under the Water Licence, including visual and geotechnical inspections. A detailed design report will be submitted to the NWB for review at least 60 days prior to implementation.

See also response for **KivIA-IR-4**.

Interested Party:	ECCC	Rec No.:	ECCC-IR-02
Re:	Increased fuel storage		

Request Made by Interested Party:

ECCC requests that the Proponent provide any further details on proposed changes to bulk fuel storage facilities and management practices related to the proposed increase in fuel storage.

Agnico Eagle's Response to Request:

Both the Spill Contingency Plan and Bulk Fuel Storage Facility Environmental Performance Monitoring Plan have been updated to reflect the proposed increase in fuel storage capacity to 20 ML (from 9.7 ML). This increase was described to include additional fuel storage at the Pump and FZone deposits, as well as an additional tank within the existing industrial pad area.

Fuel storage monitoring, management, and spill response measures will continue in accordance with the Bulk Fuel Storage Facility Environmental Performance Monitoring Plan (Appendix 5-C) and Spill Management Plan (Appendix 5-Q). Following construction, the Spill Management Plan will be updated to reflect the final fuel storage configuration, including revisions to Figure 3-1. In addition, detailed information of the new fuel storage tanks will be provided through the standard registration process required under the *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations (SOR/2008-197)*.

FISHERIES AND OCEANS CANADA (DFO)

Interested Party:	DFO	Rec No.:	DFO-IR-01
Re:	Hydrology Modeling - Baseline Considerations		

Request Made by Interested Party:

DFO requests that the Applicant provide hydrology modeling under different climate scenarios, that compares baseline conditions (i.e. no Project water use or inputs) to:

- 1. current operational Water Licence approved water use (1,100,296 m³/yr);*
- 2. proposed operational Water Licence approved water use (1,112,296 m³/yr); and*
- 3. closure Water Licence approved water use (8,676,481 m³/yr).*

The application includes a hydrology model for Meliadine Lake water levels, that compares maximum freshwater withdrawal (1,110,296 m³/yr) to current water withdrawal (519,502 m³/yr) for the operational period (2026-2036), but not to baseline conditions (i.e. no water use scenario). Similarly, the model does not compare closure period water use (2037-2043) to baseline (no water use) conditions. The lack of baseline comparison prevents the proper assessment of the impacts of Project water use and the proposed increase in water use, on fish and fish habitat.

Agnico Eagle's Response to Request:

Agnico Eagle will consider evaluations of maximum freshwater withdrawals during the Operation and Closure phases of the project. Updated lake level modelling provided in Appendix 4-D indicates no meaningful change in Meliadine Lake levels under the proposed maximum freshwater withdrawal scenario of 1,110,296 m³/year, which represents less than 0.5% of the lake's average annual inflow. The effect of the proposed increase in maximum annual freshwater withdrawal is therefore negligible, with the average annual water level change during Operations estimated at approximately 1 cm.

In addition, as per Agnico Eagle's response to Technical Comment DFO-TRC-02 during the 2024 Water Licence Amendment (Agnico Eagle 2024), Meliadine Lake levels were modelled in the 2014 FEIS. The annual withdrawal volume from Meliadine Lake for pit filling as set in the 2014 FEIS was 17,060,000 m³/year, no concerns to fish and fish habitat were identified at that time. In comparison, the withdrawal volume proposed during Closure in the Operational Update is substantially smaller at 8,676,481 m³/yr. Impacts to fish and fish habitat are anticipated to be less than those previously assessed in 2014 for which offsetting was not required.

Reference:

Agnico Eagle. 2024. Re: Agnico Eagle's Response to Technical Comments on the Meliadine Water Licence Amendment Application 2AM-MEL1631. Submitted to Nunavut Water Board. May 10, 2024.

Interested Party:	DFO	Rec No.:	DFO-IR-02
Re:	Hydrology Modeling – Winter/Under-ice Considerations		

Request Made by Interested Party:

DFO requests that the Applicant provide hydrology modeling for the winter period in addition to the summer period. This should include ice formation as a factor influencing water volumes, how the timing of open water may be impacted, and how associated outflows in Meliadine River and Diane River may be impacted. In the arctic, ice formation in winter can lock up a substantial amount of water and can significantly impact river flows and water movement. As such, understanding impacts on water use under winter conditions can be of vital importance for fish and fish habitat. The Meliadine Lake Hydrology Model considers only summer (ice-free) conditions when quantifying future water availability and notes that ice cover in winter may be explaining some of the anomalies seen in the model results, highlighting the impacts of ice formation on water quantity during winter.

Agnico Eagle's Response to Request:

Agnico Eagle started hydrological data collection in 2024, including water levels and flows at both outlets of Meliadine Lake. This forms part of a multi-year monitoring program beginning in 2024 with results to be provided in the 2026 Annual Report. This data collection effort, combined with Water Survey of Canada hydrometric records and watershed modelling, is intended to generate the data required to support a comprehensive understanding of the Meliadine Lake water balance across seasonal conditions.

Interested Party:	DFO	Rec No.:	DFO-IR-03
Re:	Hydrology Modeling – Downstream Effects		

Request Made by Interested Party:

DFO requests that the Applicant provide modeled outflows for the Meliadine River and Diane River, in addition to the modeled water levels in Meliadine Lake that were included with this application. The modeling and assessment of Meliadine River and Diane River should include analysis and discussion related to maintaining instantaneous flow alteration below 10% and mean annual discharge alteration below 30%, in the Meliadine River and Diane River, under different water use and climate scenarios. The importance of these thresholds is included in the following:

- *DFO. 2013. Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2013/017.*

In addition, the inclusion of a cross section of the outflows can be important in understanding fish passage capabilities to and from Meliadine Lake at different water levels. Maintaining the environmental flow needs in these rivers is vital to the long-term viability of fish habitat and fish use of these systems. Both Meliadine and Diane River are important for Arctic char migration, and maintaining their use is critical to local char populations. A model that accurately predicts the hydrological impacts of water use on these systems is necessary for DFO to assess and understand potential downstream impacts on fish and fish habitat.

Agnico Eagle's Response to Request:

Agnico Eagle will consider additional analysis and discussion related to lake volume, lake level, and flows for the Operation and Closure phases to evaluate the effects of proposed water use on fish and fish habitat (including Arctic Char).

See response to DFO-IR-02 for more details on multi-year hydrology studies being conducted on Meliadine Lake outflows.

See response to DFO-IR-01 for comment on potential effects to Meliadine Lake levels as assessed in the 2014 FEIS.

Interested Party:	DFO	Rec No.:	DFO-IR-04
Re:	Hydrology Monitoring Plan		

Request Made by Interested Party:

DFO requests that the Applicant provide a hydrology monitoring plan that includes:

- 1. Details of the hydrology monitoring that was used to collect data for the Meliadine Lake Hydrology Model; and*
- 2. Details on future monitoring throughout operation and closure.*

This plan should include:

- How, when, and where data is collected;*
- Considerations of summer and winter conditions; and*
- Justification on how the plan is suitable for assessing the impacts of the Project's water use on fish and fish habitat in Meliadine Lake, Meliadine River, and Diane River.*

To date, the Project has not provided a hydrology monitoring plan for assessing effects of water withdrawal on the receiving environment (i.e. Meliadine Lake water levels, and Meliadine River and Diane River discharge rates). The information being requested is necessary for DFO to assess how data is being collected for hydrological modeling and for the development of the discharge rating curve. Similarly, it is needed to understand how flows in Meliadine River and Diane River, and water levels in Meliadine Lake are being assessed by the Project. As this type of information (i.e. data collected to assess effects on the aquatic receiving environment) is typically included within an AEMP, it would be logical and prevent future confusion, if the hydrology monitoring were incorporate into the Project's AEMP. This would provide a reliable location for reviewing the design plan and monitoring results.

Agnico Eagle's Response to Request:

Agnico Eagle does not agree that a hydrology monitoring plan is required.

During the 2024 Water Licence Amendment process, Agnico Eagle committed to a 3-year hydrologic monitoring program for Meliadine Lake, spanning from 2024 until 2026. The final results of the monitoring program will be reported in the 2026 Annual Report.

Interested Party:	DFO	Rec No.:	DFO-IR-05
Re:	Response Framework / Action Levels for Water Quantity		

Request Made by Interested Party:

DFO requests that the applicant provide a conceptual response framework that includes discussion of action levels for water quantity parameters such as flow rates and timing of the open water season for Meliadine River and Diane River. A response framework that includes action levels is necessary for DFO to evaluate the Project's mitigation of risk associated with water use on fish and fish habitat.

Agnico Eagle's Response to Request:

Updated lake level modelling provided in Appendix 4-D indicates no meaningful change in Meliadine Lake levels under the proposed maximum freshwater withdrawal scenario of 1,110,296 m³/year, which represents less than 0.5% of the lake's average annual inflow. The effect of the proposed increase in maximum annual freshwater withdrawal is therefore negligible, with the average annual water level change during Operations estimated at approximately 1 cm. No delay to the open water season for the Meliadine and Diane rivers due to increased water withdrawals from the Operations is expected.

Based on negligible changes to water levels at the maximum water withdrawal rate, the need for a water quantity response framework is not warranted at this time as a change in water level of 1 cm would not be distinguishable from natural variability (i.e., climate driven factors such as precipitation, snow melt, evaporation, runoff in any given year).

Interested Party:	DFO	Rec No.:	DFO-IR-06
Re:	Mine Closure 2037-2043; Pit Back-flooding Plan		

Request Made by Interested Party:

DFO requests that the applicant provide a conceptual plan for the back-flooding of pits as described in the Interim Closure and Reclamation Plan, including proposed flooding rate, duration of flooding, time of year, etc. This back-flooding Plan should include a discussion of potential downstream impacts to fish and fish habitat, as well as a response framework and action levels, as described in DFO-IR-05.

This information is necessary to understand the potential impacts on fish and fish habitat from water withdrawal activity required for the back-flooding of the pit during closure when significantly more water use is required. This activity constitutes a significant volume of water use from Meliadine Lake with potential to impact flows in the Meliadine River and Diane River and poses a high risk to the viability of Arctic char movement through these rivers. As such, it is important to plan well in advance and establish reliable mitigation measures and response framework procedures.

Agnico Eagle's Response to Request:

This was provided in the Water Balance Water Quality Model – Technical Report (Appendix 4-C, Section 5.5), extracted below:

Given that there are no changes in pit volumes relative to those presented in Lorax (2024), the overall pit flooding strategy and timeline remains the same. Consistent with Lorax (2024), and Condition 2, Part E of Water License 2AM-MEL1631, pumping of Meliadine Lake water remains within the maximum prescribed limit of 8,676,481 m³/year over the seven-year Active Closure period (Table 5-12).

**Table 5-12:
Annual Pit Reflooding Volumes from Meliadine Lake**

Year	Pumped Volume (m³)
2037	6,791,000
2038	7,447,000
2039	7,518,000
2040	8,118,000
2041	8,118,000
2042	8,118,000
2043	7,634,994

Water withdrawals from Meliadine Lake for pit back-flooding are anticipated to occur during the open-water season (approximately June 15 to September 30). The active closure pumping schedule remains flexible and will be managed to control withdrawal rates and minimize effects on Meliadine Lake.

Also stated in Section 5.5 of Appendix 4-C, withdrawal of water from Meliadine Lake to flood the pits is predicted to result in minimal changes to the lake volume or minimum water levels (see figure below extracted from Appendix 4-C).

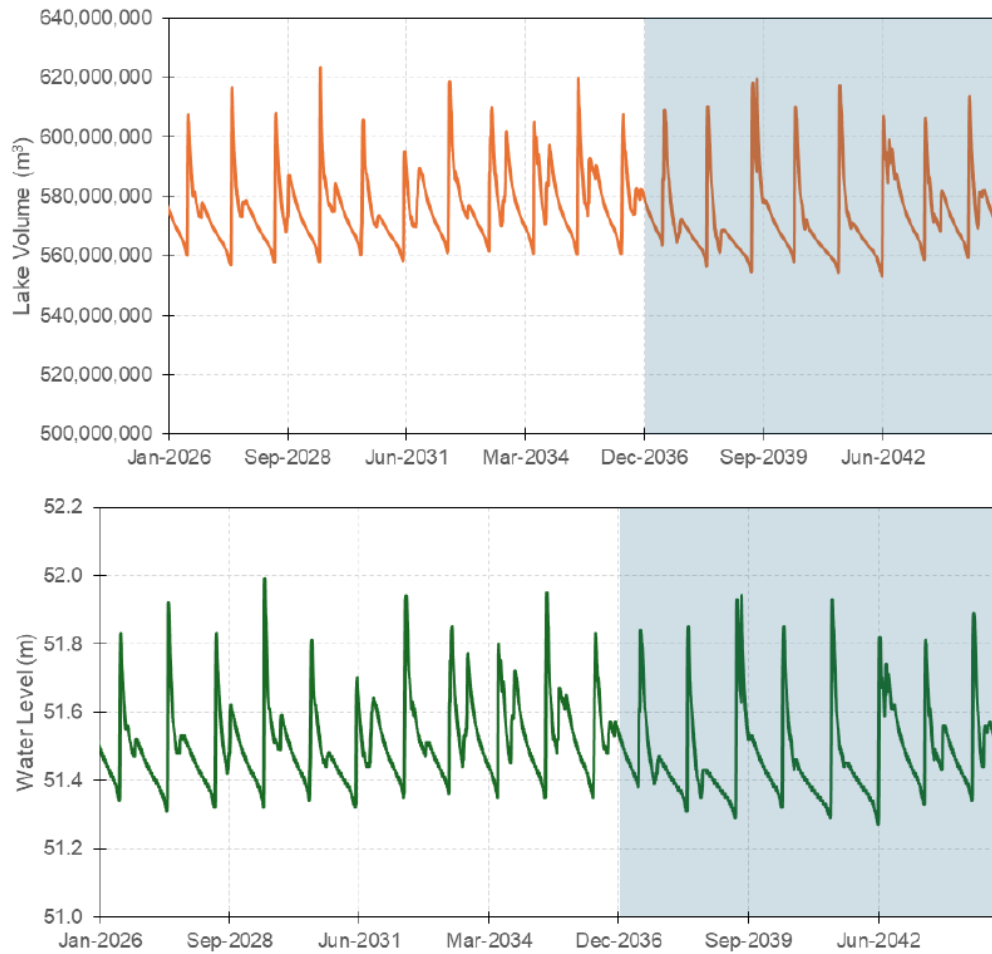


Figure 5-21: Modeled daily volume (top) and water level (bottom) of Meliadine Lake. The Active Closure phase is highlighted.

Interested Party:	DFO	Rec No.:	DFO-IR-07
Re:	Roads Management Plan – List of Culverts		

Request Made by Interested Party:

DFO requests that the applicant provide a list of the Project's culverts within the Roads management Plan, including the following information:

- *Map showing culvert locations;*
- *Geographic coordinates;*
- *Fish bearing water crossing or not;*
- *Month and year of installation; and*
- *Month and year of replacement, if applicable.*

This should also include a schedule for inspection and maintenance. This information is necessary for DFO to assess the Project's potential impacts of current culverts on fish movement in the area.

Agnico Eagle's Response to Request:

Agnico Eagle does not believe an update to the Roads Management Plan is necessary. Maps of existing culvert locations are provided as Figure 2 in the Freshet Management Plan, and in the Annual Geotechnical Inspection report as part of the Annual Reporting (most recently as Appendix 06 of the 2025 Annual Report). Coordinates are also provided with images of crossings in the Annual Geotechnical Inspection report.

Prior to installation of culverts, watercourses are assessed through field studies as either fish-bearing or non-fish bearing. Fish-bearing watercourse crossings (i.e., culverts) are submitted to DFO for review and to ensure culvert design is adequate to allow fish passage while fulfilling operational requirements. Agnico Eagle will continue to submit fish-bearing watercourse crossing designs to DFO for review prior to any installations.

All watercourse crossing locations are inspected twice weekly during freshet (Mid-May through June) and then weekly during the remainder of the ice-free period prior to fall freeze-up (July through October), per the Roads Management Plan. Watercourse crossings are also inspected annually through the Annual Geotechnical Inspection. Agnico Eagle has extensive experience constructing and maintaining culverts and roads in Nunavut. Maintenance of culverts is conducted as needed, based on the regular inspections.

In addition, DFO completed a site visit in July 2025, which included inspection of culverts along the All Weather Access Road (AWAR), Rankin Inlet Bypass Road, and Exploration Road. Culverts were found to be compliant during this visit, as was noted in DFO's NIRB 2025 Annual Report review comments.