Environmental Protection Operations Directorate
Prairie & Northern Region
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ECCC File: 6100 000 036/010
NWB File: 2AM MEL 1631

October 6, 2026

via email at: licensing@nwb-oen.ca

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 2AM MEL 1631 – Agnico Eagle Mines – Meliadine Mine – Type A Water Licence Amendment

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Water Licence Amendment.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate and within federal jurisdiction, including greenhouse gas emissions and climate change, air quality, water quality and quantity, migratory birds, species at risk, environmental emergencies preparedness and response, and climate and meteorology. This work includes reviewing proponent's characterization of environmental effects and proposed mitigation measures, and providing information and knowledge to decision-makers on activities needed to mitigate these environmental effects within federal jurisdiction. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comment is provided:

1. Topic – Guidelines for listed waterbodies

Reference(s)

- Interim Closure and Reclamation Plan – Update 2026 (Agnico Eagle; June 2026) Appendix 5-I
    - Section 1.3: Goal of the Closure and Reclamation Plan
    - Section 4.2.4.5: Engineering Work Associated with Selected Closure Activity

- Meliadine Mine Water Balance and Water Quality Model – Water Management Plan Section 5
    - Section 5.4.6: Closure and Post closure assumptions
    - Section 6: Water Quality

Comment

During the 2024 Meliadine Water Licence amendment process, ECCC noted that the Interim Closure and Reclamation Plan (ICRP) does not specify whether the guidelines to be used were those for the protection of aquatic life, or those for terrestrial life (ECCC TC #19, (2024)). During the technical meeting (June 5, 2024) and the subsequent follow-up discussions (July 10, 2024, Final Hearing Sept 11-12, 2024) the Proponent stated that waterbodies listed as tailings impoundment areas under Schedule 2 of the *Metal and Diamond Mining Effluent Regulations* (MDMER) should have distinct criteria. The Proponent requested that certain lakes on site be added as tailings impoundment areas under Schedule 2, including Lake B4 (future CP8) and Lake B7 (future SP6). If successful, they argue that since those lakes will not be removed from Schedule 2, less stringent water quality criteria for the protection of terrestrial life could be appropriate.

The updated Interim Closure and Reclamation Plan (2026) shows that at closure all pits and ponds will be reconnected to the regional surface water network. Given local conditions, all water bodies can reasonably be expected to become fish-bearing over time. Therefore, criteria for the protection of aquatic life are the most appropriate for closure, especially given that one of the goals of the Plan is "*no long-term active care requirements*", for which "*any post-closure monitoring can only continue for a defined period of time.*"

ECCC Recommendation(s)

ECCC continues to recommend that the ICRP be updated to specify preliminary water quality criteria for closure that will be protective of aquatic life for all waterbodies, since, at closure, waterbodies will all be reconnected to the fish bearing regional surface water system regardless of their Schedule 2 status as tailings impoundment areas.

ECCC also recommends that the water balance and water quality model be updated to reflect these changes as the current model is still comparing predicted water quality in certain lakes against terrestrial protection guidelines.

If you need more information, please contact Russell Wykes at Russell.Wykes@ec.gc.ca.

Sincerely,

J Small

Jody Small
Regional Director, Prairie and Northern Region, EPOD

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)