

- Comments and recommendations are provided in Section 2 of this technical memorandum.

2.1 Aquatic Environment Technical Comments

Reviewer	#	Reference	Comment	Recommendation
HESL on behalf of KIA	1.	Meliadine Gold Project 2020 Annual Report Section 7.8.1 Air Quality Monitoring	<p>Agnico Eagle reports that dustfall monitoring occurs year-round through passive measurement at four onsite sampling stations, and summertime dustfall transect sampling at two locations along the AWAR. Dust suppressant and road watering were applied to AWAR and haul roads in 2020.</p> <p>Agnico Eagle states that “<i>results of dustfall monitoring indicate that for both onsite and AWAR locations, these and other best-management practices in place for dust mitigation are being effectively implemented to minimize emissions</i>” (p. 94).</p> <p>However, it is not clear how monitoring is structured to test the effectiveness of best management practices, such as the use of dust suppressant and road watering. For example, is dustfall compared at locations before and after application of best management practices? Or is dustfall compared between sites receiving best management practices vs. sites where none are applied?</p>	Agnico Eagle should explain how dustfall monitoring is designed to test the effectiveness of best management practices in use on site. The description of experimental design should include information on location and timing of monitoring in relation to the application of mitigation measures, and information on what comparisons are made to assess effectiveness.
HESL on behalf of KIA	2.	Appendix 15: 2020 Reportable Spills	Agnico Eagle reports that on March 19 a crack was noticed in the floor of the SWTP, which caused process water to leak below. It was estimated that approximately 300 m ³ of saline water may have leaked through the foundation. The spill report describes the response, clean-up and corrective measures. However, there is no discussion of possible reasons for the crack, nor how long it was likely present before being detected.	Agnico Eagle should discuss reasons for the crack that allowed saline water to seep under the floor at the SWTP, and should estimate how long they believe it was present prior to being noticed.

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¹Province of British Columbia. 2013. Part A – Quality Control and Quality Assurance, Appendix 3 – Quality Assurance Guidelines to Supplement the Standard Effluent and Receiving Environment Quality Assurance Clause https://www2.gov.bc.ca/assets/gov/environment/research-monitoring-and-reporting/monitoring/emre/bc_field_sampling_manual_part_a.pdf

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Meliadine Gold Project 2020 Annual Report (March 2021)				
AWR on behalf of KIA	1	S 10.3 AWAR	The traffic volumes along the All-Weather Access Road (AWAR) in 2020 continue to exceed levels predicted for the AWAR in the FEIS by 42% overall (S 10.3, Table 25, pg 108). Traffic volumes during July, which coincided with caribou movement through the site, exceeded levels predicted in the FEIS by 91% (S 10.3, Table 25, pg 108) despite the closure of AWAR over a 10-day period for a total of 165 hours between 7 and 19 July due to caribou migration and no apparent water tanker traffic that month (Appen. 34, 2020 AWAR Usage, Table 1).	Agnico Eagle should clarify whether and when traffic volumes predicted in the FEIS will be attained, and if they won't be attained, what implications this has for assessment of impacts of the project on wildlife.
Appendix 26 2020 Terrestrial Effects Monitoring and Mitigation Program Annual Report (April 2021)				
AWR on behalf of KIA	2	TEMMP	Terminology: The Meliadine Project Final Environmental Impact Statement (FEIS) included a Terrestrial Environment Management and Monitoring Plan (V2, November 2015; using 'TEMMP' as the acronym). This Plan and the subsequent update (V3; June 2020) stated that "An annual Terrestrial Environment Monitoring Summary Report for the project will be completed". Appendix 26 to the current annual report is titled "Appendix 26: 2020 Terrestrial Environment Management and Monitoring Plan Report ", yet the Golder document after the title page is titled "2020 Terrestrial Effects Monitoring and Mitigation Program Annual Report " (5 April 2021) and uses TEMMP as the acronym. These titles, intermixing of management, monitoring and mitigation, and	Agnico Eagle should clarify the various titles of the TEMMP plans, programs and reports.

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Appendix 24 - 2020 Air Quality Monitoring Report (March 2021)

KIA appreciates the opportunity to provide comments on the 2020 Annual Report for the Meliadine Gold Project. Please contact Luis Manzo, Director of Lands, should you require more information.

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