



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-MEL1631
Our file - Notre référence
GCDocs#125340398

May 15, 2024

Robert Hunter
Licensing Administrator
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 (CIRNAC's) Review of the 2023 Annual Report for Meliadine Gold Mine Project, Type A Water Licence No. 2AM-MEL1631.

Dear Mr. Hunter,

Thank you for your April 05, 2024, invitation to review the 2023 Annual Report for the Meliadine Gold Mine Project, submitted by Agnico Eagle Mines Limited, for Type A Water Licence No. 2AM-MEL1631.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the Report and its attachments 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 Technical Memorandum for the Nunavut Water Board's consideration.

If there are any questions or concerns, please contact me at Aminul.Haque@rcaanc-cirnac.gc.ca or (867) 975-4282 or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

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Aminul Haque
Regional Water Management Coordinator



Technical Review Memorandum

Date: May 15, 2024

To: Robert Hunter, Licensing Administrator, Nunavut Water Board

From: Aminul Haque, Regional Water Management Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC's)
Review of the 2023 Annual Report for Meliadine Gold Mine Project, Type
A Water Licence No. 2AM-MEL1631.

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

Agnico Eagle Mines' (Agnico Eagle's) 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, 80 km southwest of Chesterfield Inlet, and 290 km southeast of the Meadowbank mine. The Project site is situated on a peninsula amongst the east, south, and west basins of Meliadine Lake (63°1'23.8"N, 92°13'6.42"W), on Inuit-owned land. The 111,358-hectare property covers an 80-km-long greenstone belt. A 24-km all-weather gravel access road (built in October 2013) links the Meliadine project site with Rankin Inlet. The NIRB Project Certificate (PC No. 006) was issued to AEM on February 26, 2015. AEM was issued a water licence for this project by the Nunavut Water Board (NWB) on April 15, 2016. The mine commenced its commercial production on May 14, 2019.

Meliadine includes seven gold deposits: Tiriganiaq, Normeg, Wesmeg, Pump, F-Zone, Wolf and Discovery. The approved Project consists of mining at five deposits (Tiriganiaq, Wesmeg, Pump, F Zone, and Discovery) through a phased approach and processing of the ore at an on-site milling operation at a rate of 8,500 tonnes per day, as well as transportation of the gold bullion south for final refinement and sale. The deposits are all within five (5) km of Tiriganiaq except for Discovery, which is 17 km southeast of Tiriganiaq. Each of these deposits has mineralization within 120 metres of the surface, making them potentially mineable by open pit methods. Also, because of their deeper mineralization, they could be mined with underground methods. The current mineral reserves are mainly in the Tiriganiaq deposits at underground and open pit depths. In Phase 1 of the mine, the ore is being sourced underground with access by decline, using long-hole mining methods. In Phase 2, the ore will be sourced from both the underground and open pits. A conventional truck/shovel operation is anticipated for the open pits. The Project includes the extended exploration, construction, operation, closure, and reclamation of underground and open-pit mines and associated infrastructure for extracting, processing and transporting gold. Tiriganiaq mining will occur using above-ground and underground methods, with the other four (4) deposits mined using open pit



methods. There are three (3) main Project areas: the Tiriganiaq mine site (Underground Mine, Open Pits 1 & 2), the Discovery deposit, and the Itivia Harbour.

The Tiriganiaq mine site includes the camp, landfarm, landfill, incinerator, and fuel tank farms, all of which were completed in late 2017. In addition, the underground portal has been active since 2007/2008, when it was constructed for bulk sampling. The mine site also includes three (3) waste rock piles, three (3) ore stockpiles, and a tailings storage facility. Transportation of personnel and supplies occurs via the All-Weather Access Road (AWAR) between Rankin Inlet and the Meliadine site; Phase 1 of the AWAR was approved by the NIRB in 2012 as an exception to the review of the Meliadine Gold Mine project and was completed in 2013.

Supplies and equipment for the Project are barged into Itivia Harbour, Melvin Bay in Rankin Inlet, during the open water season. The Itivia project area includes quarry operations that began in 2017 and a laydown area and fuel tank farm completed in the summer of 2018. Construction of the bypass road from Itivia to the start of the AWAR was completed in the fall of 2018. The bypass road enables mine traffic to avoid the community of Rankin Inlet while transporting fuel and equipment to the Project mine site.

During 2023, the NWB considered another Type A Water Licence amendment application triggered by the Meliadine Extension Proposal. The application was withdrawn by Agnico Eagle on December 19, 2023, following NIRB's recommendation that the Extension Proposal should not be allowed at this time based on the potential for significant adverse ecosystemic and socio-economic effects.

With the withdrawal of the Meliadine Extension Application to support the completion of mining of all deposits permitted at the Meliadine Mine, Agnico Eagle has identified components included in the 2014 FEIS and already approved under the Nunavut Impact Review Board's (NIRB) Project Certificate No. 006. These specified project components now require a further amendment of the Type A Water Licence (collectively called the Meliadine Mine Water Licence Amendment). On January 29, 2024, the NWB distributed an amendment application for Agnico Eagle Mines Limited Meliadine Mine water licence 2AM-MEL1631 to regulators and interested parties. The regulatory process for the Meliadine Mine Water Licence Amendment is currently underway.

CIRNAC provides the following comments and recommendations pertaining to the 2023 Meliadine Gold Mine Annual Report. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Saline Water Volumes Pumped to Tiriganiaq Open Pit #2 (TIRI02)
R-02	General Comments on the 2023 Geotechnical Inspection Report
R-03	Saline Water Discharge to Meliadine Lake
R-04	Impacts of Effluent Discharge on Phytoplankton in Meliadine Lake
R-05	Water Quality Predictions
R-06	Sludge Disposal
R-07	Improvements to Annual Report

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) lists the documents reviewed under the submission and references during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
240331 2AM-MEL1631 2023 Annual Report & Appendices	
Meliadine Gold Mine – 2023 Annual Report, Main Document, V1	AEM, March 2024
Appendix Documents	
Appendix 01 - 2023 Meliadine Gold Mine Annual Report Appendix Summary Table	AEM, March 2024
Appendix 02 - 2023 Drill Site Locations	AEM, March 2024
Appendix 03 - General Site Layout	AEM, March 2024
Appendix 04 – Water Balance and Water Quality Modelling Tabular Data	AEM, March 2024
Appendix 05 - CP1 Nutrients Predictions	AEM, March 2024
Appendix 06 - 2023 Annual Geotechnical Inspection Report	Tetra Tech, 31Jan 2024
Appendix 07 - 2022 Annual Geotechnical Report Agnico Eagle Responses & Action Table	AEM, March 2024
Appendix 08 - 2023 Annual Geotechnical Report Agnico Eagle Responses & Action Table	AEM, March 2024
Appendix 09 - 2023 Metal Leaching and Acid Rock Drainage Monitoring Report	AEM, March 2024
Appendix 10 - 2023 Results of the Tailings Supernatant Sampling	AEM, March 2024
Appendix 11 - WRSF1 and WRSF2 Plans and Sections (at the end of 2023)	AEM, March 2024
Appendix 12 – TSF Plans and Sections (at the end of 2023)	AEM, March 2024
Appendix 13 – 2023 Stack Testing Report	ConsulAir, March 2024
Appendix 14 – 2023 Reportable Spills (NTNU Spill Reports)	AEM, March 2024
Appendix 15 - 2023 Non-Reportable Spills (Table of Non-Reportable Spills)	AEM, March 2024
Appendix 16 - 2023 Mock Scenario Spill Report	AEM, November 2023
Appendix 17 – 2023 Aquatic Effects Monitoring Program (AEMP) Report	AEM, 24 March 2024
Appendix 18 – 2023 Water Monitoring Station Results	AEM, March 2024
Appendix 19 – 2023 Diamond Drill Hole (DDH) Water Sample Results	AEM, March 2024



Document Title	Author, File No., Rev., Date
Appendix 20 – 2023 Calibration Data	AEM, March 2024
Appendix 21 – 2023 Blast Monitoring Report	AEM, March 2024
Appendix 22 – 2023 Noise Monitoring Report	AEM, March 2024
Appendix 23 - 2023 Air Quality Monitoring Report	AEM, March 2024
Appendix 24 - 2023 Toolbox Presentations	AEM, March 2024
Appendix 25 - 2023 Terrestrial Effects Monitoring and Mitigation Program Annual Report	WSP, 26 March 2024
Appendix 26 - 2023 Wildlife Observations	AEM, March 2024
Appendix 27 - 2023 Marine Mammal and Seabird Observations (MMSO) Annual Report	ERM, March 2024
Appendix 28 - Management Plans	
Appendix 28 – 1 Blast Monitoring Program Version 6	AEM, March 2024
Appendix 28 – 2 Explosives Management Plan Version 10	AEM, March 2024
Appendix 28 – 3 Incineration Management Plan Version 8	AEM, March 2024
Appendix 28 – 4 Mine Waste Management Plan Version 11	AEM, March 2024
Appendix 28 – 5 OPEP OPPP Version 9	AEM, July 2023
Appendix 28 – 6 Ore Storage Management Plan Version 6	AEM, March 2024
Appendix 28 – 7 Roads Management Plan Version 10	AEM, March 2024
Appendix 28 – 8 Spill Contingency Plan Version 15	AEM, March 2024
Appendix 28 – 9 Water Management Plan Version 14	AEM, March 2024
Appendix 29 - 2023 Post-Oil Transfer Reports	AEM, March 2024
Appendix 30 - 2023 Community Engagement Table	AEM, March 2024
Appendix 31 - 2023 Community Liaison Newsletter	AEM, Fall 2023
Appendix 32 – 2023 TAG Annual Report	AEM, March 2024
Appendix 33 - Socio-Economic Monitoring Program	Stratos & AEM, March 2022
Appendix 34 – 2023 Socio-Economic Monitoring Program Report	Aglu & ERM, March 2024
Appendix 35 – 2023 Training	AEM, March 2024
Appendix 36 - NIRB Project Certificate Tracking Table	AEM, March 2024
Appendix 37 - NWB Water Licence Tracking Table	AEM, March 2024
Appendix 38 – 2023 Annual Report Comment Table	AEM, March 2024
Appendix 39 – Inuktitut Summaries of Monitoring Results	AEM, March 2024
Other Reports/Information	
Nunavut Water Board Amended Water Licence No: 2AM-MEL1631	Issued 13 May 2021
Impact Assessment of the Diversion of Site Runoff to Melvin Bay on the Flow and Water Level Regimes of Meliadine Lake	Golder, 6 July 2020
CIRNAC's Review of the 2022 Annual Report for Meliadine Gold Mine Project, Type A Water Licence No. 2AM-MEL 1631	CIRNAC, 4 July 2023
Meliadine Mine 2022 Annual Report for Water Licence 2AM-MEL1631	AEM, 15 September 2023
CIRNAC's Reply to AEM Responses on the 2022 Annual Report Review Comments for the Meliadine Gold Mine Project, Type A Water Licence No. 2AM-MEL1631	CIRNAC, 14 December 2023



C. RESULTS OF REVIEW

1. Saline Water Volumes Pumped to Tiriganiaq Open Pit #2 (TIRI02)

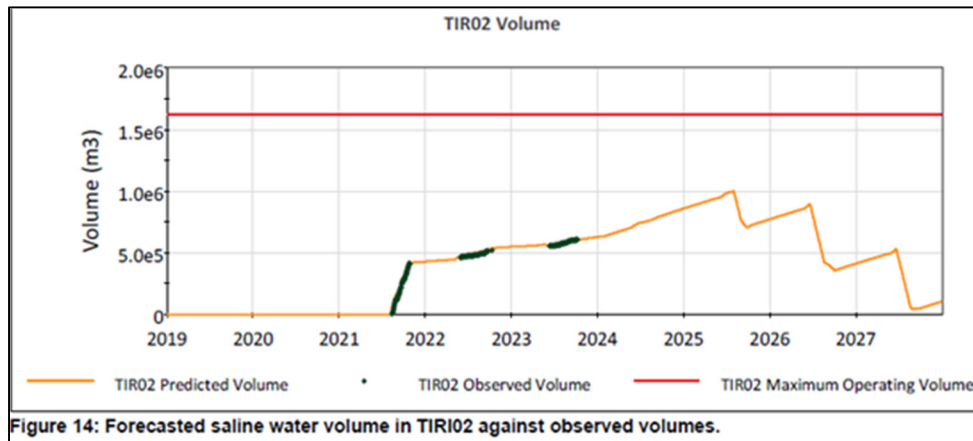
Comment:

Section 3.1.3 of the 2023 Annual Report states that the volume of underground saline water pumped to the surface was 71,971 m³ in 2023, and Table 4 provides the pumping distribution by month over the year.

A review of prior annual reports found similar information provided for each of the previous years starting in 2018. The pumped volumes are summarized in the Table below. As seen in the table, the reported total volume of underground saline water pumped into the pit was 373,906 m³ by the end of 2023.

2018	2019	2020	2021	2022	2023	total to date
37,766	37,031	103,486	54,805	68,845	71,973	373,906

Section 3.2.1.4 Figure 14 shows the results of modelled and observed volumes of saline water in TIRI02, noting that saline water pumped from Tiriganiaq underground will be stored in TIRI02 until 2025, after which the water will be discharged through the waterline to Itivia Harbour. Predicted groundwater inflow rates to the underground mine were updated in 2024 to reflect an updated mine plan scenario and included a limited calibration based on groundwater inflow monitoring over previous years. The updated results are discussed in the Groundwater Management Plan (GWMP).



As seen in Figure 14, the saline water stored in the pit was approximately 500,000 m³ in 2023. This varies significantly from the 373,906 m³ total reported in the annual reports for the years 2018 to 2023. Note that these volumes do not include the reduction of pit volumes for any discharge of saline water that occurred from 2019 to 2021.



Table 1 in Section 2.1 Predicted Groundwater Volumes of the Groundwater Management Plan, Appendix A to the Water Management Plan, provides Predicted Groundwater Inflow for the years 2023 to 2031, as seen below.

Table 1: Predicted Groundwater Inflow and TDS to the Underground Mine (2017 to 2033)

Year	Predicted Groundwater Inflow (m ³ /day)	Predicted TDS (mg/L)
2023	300	57,500
2024	450	57,000
2025	450	57,000
2026	475	56,500
2027	475	56,500
2028	450	56,500
2029	475	54,000
2030	475	53,500
2031	475	53,500
2032	450	53,500
2033	450	53,500

Based on this table, additional groundwater inflow to the pit would be 328,500 m³ from 2024 to 2025, for a total of 702,406 m³. This varies substantially from the 1,000,000 shown in Figure 14.

CIRNAC notes that the inflow predictions in Table 1 above vary from the inflow predictions provided by Agnico Eagle in support of the Amendment Application of January 2024, which included Table 16 of the Water Management Plan and Table 6 of the Updated Hydrogeology Modelling Report. These two tables also varied from each other.

In light of the variances between actual volumes reported to date and predictions to date and the provision of three different predicted rate tables for inflow for future years, it is difficult to have confidence in the projections of saline water inflows going forward.

Recommendation:

(R-01) CIRNAC recommends that Agnico Eagle:

- Explain the difference between the total volume of underground saline water pumped to surface as reported in Section 3.1.3 from 2018 to 2023 to the volumes shown in Figure 14 to 2023, and
- Reconcile the differences in the predicted groundwater inflow rate going forward from 2024.

2. General Comments on the Annual Geotechnical Report

Comment:

In general, CIRNAC has no concerns with the proposed action plans stated in Agnico Eagle's Responses and Action Tables nor with the observations provided by Tetra Tech



as part of their Annual Geotechnical Inspection Report for 2023. There has been a marked improvement with the implementation of recommendations from prior and this year's inspection report, particularly as it relates to the construction of permafrost/thermal barrier upgrades and site rehabilitation to address thermal degradation concerns with surface water flow channels and areas previously identified between key infrastructure and these channels.

Some relatively minor concerns have been noted with respect to how information is presented in the inspection report, and some clarity is required on certain items where recommendations note continued monitoring of minor concerns. However, there are no trigger levels identified which would prompt Agnico Eagle to take action to address these ongoing concerns. It would be helpful to the project team and stakeholders to have a clear understanding of when actions will be undertaken by Agnico Eagle. In other words, what are the thresholds for taking action on issues versus simply continuing to monitor?

In addition, CIRNAC recommends that a geotechnical review/inspection of the discharge pipeline, currently under construction, be explicitly included in the Inspection Report. From some of the language in the 2023 report, it was not clear if the earthworks associated with the pipeline placement were impacting existing road culverts along the All-Weather Access Road (AWAR) or if the construction of the pipeline was changing the ponding conditions of surface water in low areas along the AWAR. Note that the Tetra Tech inspection report did not go into any detail on the proposed improvements to surface water drainage in these areas of concern but referenced a design document provided to Agnico Eagle, which CIRNAC understands will form the specification for future construction in these low-lying areas along the AWAR.

The observation of ponded water in the Itivia tank farm containment structure has been an ongoing concern identified in nearly every annual report. Agnico Eagle should provide a more detailed response as to when the water in the containment structure is pumped out. The process for how to go about confirming the water quality is well understood and likely documented in a number of site management plans, however, no record has ever been seen by the reviewer confirming when ponded water has been removed from this structure. This information should be provided to Tetra Tech so they can comment on how this concern has been addressed.

Given the importance of monitoring and reporting on the potential impacts of surface water flow during the freshet on the AWAR and Bypass Road, the freshet period monitoring report, as completed by Agnico Eagle, should be provided to the geotechnical inspection engineer. This is so the engineer can be made aware of the site conditions and provide further recommendations regarding rehabilitation or improvements required to mitigate



concerns with surface water flow in known low spots and water collection points along the respective roadways. This is particularly important given the observation noted above regarding the geotechnical review/inspection of the discharge pipeline.

Recommendation:

(R-02) CIRNAC recommends that:

- a) The Annual Geotechnical Review include observations along the construction alignment of the waterline to Itivia Harbour, and that the inspection should specifically address any concerns regarding construction methods and implementation which may impede the flow of water. Tetra Tech identified some areas of concern that appear to be related to the construction of the discharge pipeline; however, the text was not clear in this regard.
- b) In future geotechnical reports, a more appropriate base map should be used for the Tailings Storage Facility (TSF). The current base image is dated and does not represent current site conditions in the area around the TSF.
- c) Future inspection reports should provide the cross-section profiles for the TSF with both the major and minor axes. The TSF's cross-section profiles only included one orientation, the minor axis cross-sections, which is not consistent with normal industry standards.
- d) Agnico Eagle provides some clarification on when monitoring concerns become either actionable rehabilitation or repair items. In addition, Tetra Tech should advise Agnico Eagle on what work is required to address low-priority items that have become higher priorities.
- e) Agnico Eagle should provide a more detailed response regarding when the water in the Itivia tank farm containment structure is pumped out.
- f) Agnico Eagle provide the freshet period monitoring report on the AWAR and Bypass Road to the geotechnical inspection engineer to raise awareness of the site conditions and any potential further recommendations regarding rehabilitation and/or improvements.

3. Saline Water Discharge to Meliadine Lake

Comment:

Section 3.1.7 of the 2023 Annual Report states that operation of the waterline for discharge to Melvin Bay is anticipated to significantly minimize or eliminate discharges to Meliadine Lake.

CIRNAC notes as part of the 2022 Annual Report review process, Agnico Eagle provided responses to CIRNAC's recommendation R-05 with respect to a) confirming duration of use of TIRI02 pit for storage of saline groundwater and b) providing evidence that the use



of TIRI02 pit, or any other open pits, for more than emergency temporary storage has been reviewed and approved by regulatory authorities.

According to AEM's responses to these questions, CIRNAC replied, "*CIRNAC understands that Agnico Eagle intends to discharge Tiriganiaq Pit 2 water to Itivia Harbour via the waterline in 2025. Agnico Eagle should seek NWB's approval if saline water is stored in Tiriganiaq Pit 2 or any other pit/pond beyond 2025. Also, Agnico Eagle should commit to ensuring that saline water from Tiriganiaq Pit 2 or any other saline/contact water storage will never be mixed with surface water and/or discharged into Meliadine Lake.*"

The review of the 2023 Annual Report noted no reference to this commitment in the main report. However; revisions to Appendix 28-9 Water Management Plan included the following statement: "*Added statement regarding no water in saline ponds discharging to Meliadine Lake in Section 3.6*". The Section 3.6 revision follows: "*Water stored in the saline ponds is isolated from the surface runoff collection system (i.e., CP1 to CP6) and will thus not be discharged to Meliadine Lake*". This sentence follows this: "*However, permeate water produced by the treatment of marginally saline water at the RO Plant is discharged to CP1 (Section 3.9.6)*".

Recommendation:

(R-03) CIRNAC recommends that in the appropriate sections of the main Annual Report, Agnico Eagle include the commitment that under no circumstances will saline water from Tiriganiaq Pit 2 or any other saline water storage be mixed with surface contact water and/or discharged into Meliadine Lake.

4. Impacts of Effluent Discharge on Phytoplankton in Meliadine Lake

Comment:

Data from the Aquatic Effects Monitoring Program (AEMP) note the increasing concentration of some chemicals in the surface waters of Meliadine Lake after the release of treated effluent. These elements and chemicals may contribute to increasing primary productivity by separate pathways. CIRNAC believes the present monitoring frequency (i.e., collecting water samples three times a year) is insufficient. The uncertainty in this assessment is too high to assess the cumulative impact and make definitive statements on whether or not treated and untreated effluent results in "algal blooms."

Recommendation:

(R-04) CIRNAC recommends that Agnico Eagle study the water quality issues in Lake Meliadine in more detail to expand data collection and assessment. Examples include, but are not limited to:

- a) Extending the current AEMP monitoring period (i.e., June to October instead of July to September) and increasing the frequency of water chemistry monitoring (i.e.,



once a week instead of once a month) to help define the factors influencing the system's productivity,

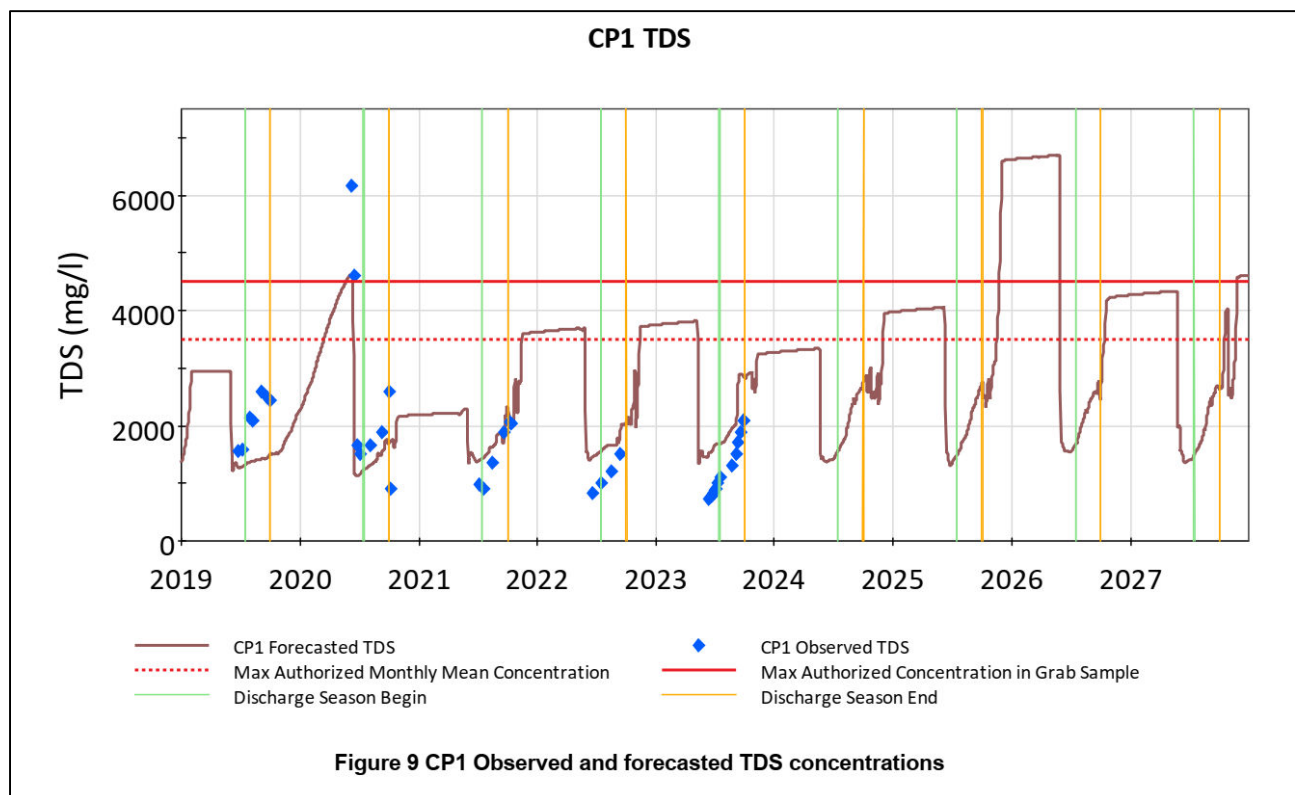
- b) Collecting oxygen profiles, turbidity data and water chemistry measurements (including dissolved organic and inorganic carbon) at depth to determine if the elevation of organic material in surface water and at depth indicates the early stages of eutrophication and the accumulation of organic material,
- c) Collecting and analyzing lake bottom sediment samples annually for trend analysis.

5. Water Quality Predictions

Comment:

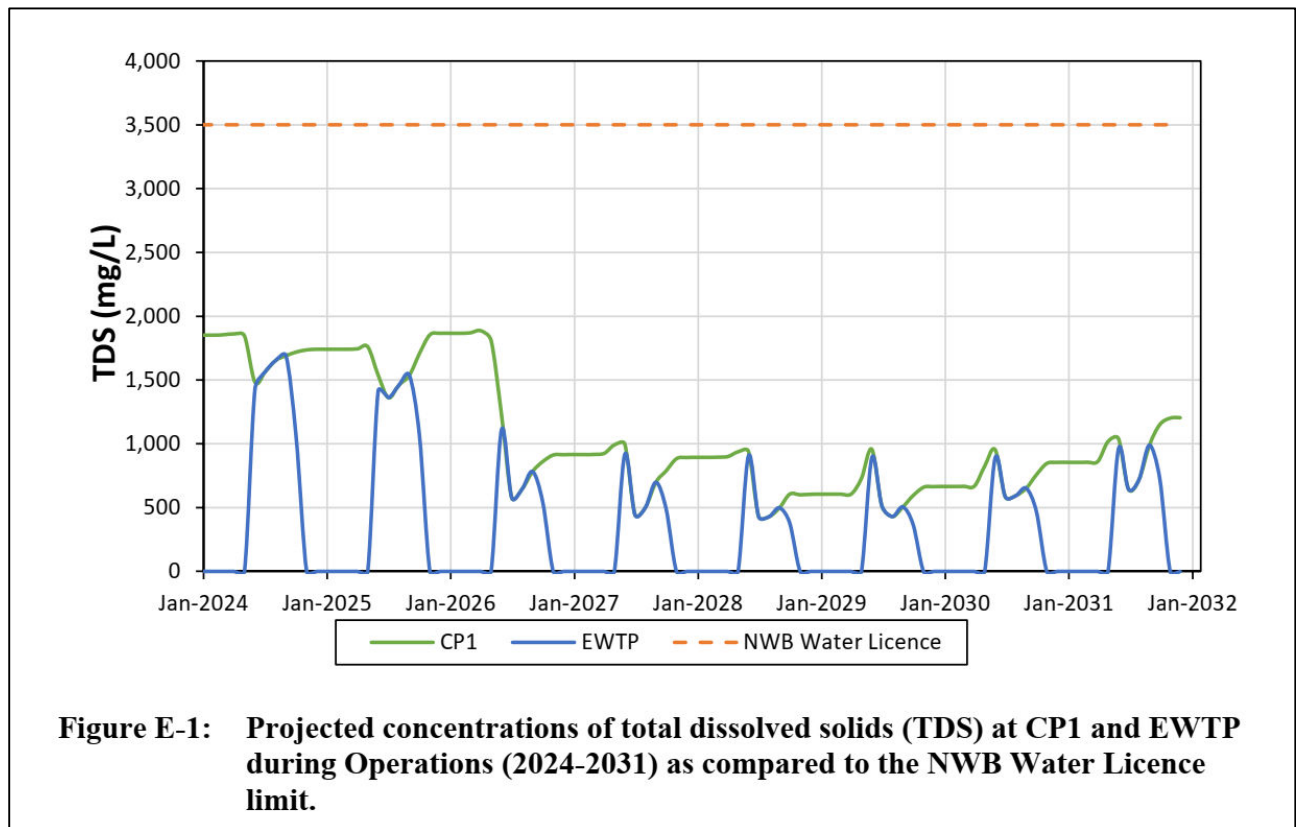
As shown in the figures below, the total dissolved solids (TDS) predicted concentrations in CP1 presented in Appendix 4 of the 2023 Annual Report are much higher than the TDS predictions presented during the Meliadine Amendment process (Lorax Memo, 23 February 2024). It is not clear to CIRNAC why there would be a discrepancy in the CP1 TDS predictions between documents.

From the 2023 Annual report (Appendix 4, page 492):





From the 2024 Amendment Application (Appendix B_WBWQM Figures, Lorax-memo: February 23, 2024):



Recommendation:

(R-05) CIRNAC recommends that Agnico Eagle provide the following:

- a) The Water Balance and Water Quality Modelling (WBWQM) figures showing concentrations during operations, closure and post-closure,
- b) Clarification on the differences in predicted CP1 TDS concentrations between the 2024 Amendment Application and the 2023 Annual Report from 2024 to 2028.

6. Sludge Disposal

Comment:

A new Section 7.3.3 was added to the 2023 Annual Report, discussing the monitoring of sludge produced as part of the total suspended solids (TSS) removal processes at the EWTP-WTC. The sludge is sampled monthly to assess its potential impact on receiving saline ponds (Tiriganiaq Open Pit #2, TIRI02). Table 19 presents the monthly analysis of solids content for the period 2022-2023, while Table 20 presents summary statistics of water quality results for the period 2021-2023.



With respect to Table 20, Agnico Eagle notes that the data suggest that the sludge is unlikely to negatively impact the pH, conductivity, total ammonia, total copper, total lead, total nickel and total zinc in saline contact water based on existing water quality data collected in TIRI02. In reviewing the 2023 Annual Report, TIRI02 water quality data were only provided for total dissolved solids (TDS), total ammonia and radium-226 in Figures 15, 16 and 17 of the main report and in Appendix 4. Without access to additional water quality data for TIRI02, CIRNAC was not able to confirm Agnico Eagle's conclusions that sludge placed in the pit is unlikely to negatively impact the water quality in TIRI02.

In Section 7.3.3, Agnico Eagle also provided information on a Scenario Analysis that was completed in Q1 of 2024 on alternative sludge management strategies for the Water Treatment Complex, but the report was not included with the 2023 Annual Report submission.

Recommendation:

(R-06) CIRNAC recommends that Agnico Eagle:

- a) Provide data collected on TIRI02 water quality for comparison to the sludge water quality data,
- b) Provide the Scenario Analysis report on alternative sludge management studies for review.

7. Improvements to Annual Report

Comment:

Tailings Storage Facility

As noted in the 2022 Annual Report review comment (R-02) Tailings Storage Facility (TSF) Plans and Sections at the end of 2022 (Appendix 13), CIRNAC requested that in addition to the cross-section A-A (east-west), a cross-section B-B (north-south) along the length of the tailings facility should be added to the TSF Plans and Sections. Agnico Eagle responded that "cross sections that have been provided are sufficient to understand the development of the TSF" and has not provided the requested cross-section in 2023 Appendix 12. CIRNAC disagrees with Agnico Eagle on this matter as the TSF consists of two cells at varying heights, and no cross-section has been provided showing this and the slope between the two cells.

Water Consumption by Major Categories

The 2023 Annual Report provides the total water consumption from Meliadine Lake. However, it does not provide information on the distribution of water use by major categories (e.g., camp, paste plant, Mill, etc.). Such information would be useful for



understanding actual consumption requirements for these use categories and comparing use trends over time.

Management Plans

A review of the 2023 environmental management and protection plans found that the document control section tracking revision changes has improved over time, allowing for a more efficient review of updates with two exceptions:

- a) Three Management Plans are embedded as appendices to the Water Management Plan (WMP):
 - Appendix A - Groundwater Management Plan
 - Appendix B – Freshet Management Plan
 - Appendix C – Sediment and Erosion Management Plan

These plans are essentially buried within the WMP, and the WMP's document control does not say anything about changes to one or more of its appendices.

- b) Prior to the 2024 revision, the Road Management Plan was last updated in March of 2022. As a result, it has not been updated for 2 years. From a review of CIRNAC's records, CIRNAC saw no evidence of the Road Management Plan being submitted with Agnico Eagle's 2021 or 2022 Annual Reports. A review of the current 2024 Document Control found only one reference to the waterline (i.e., S8-1 Addition of non-reflective delineators for identification of the waterline in road signage). A review of the body of the plan found numerous places where the waterline is mentioned, including Section 6.5 Construction of the Waterline, and Section 7.2 Watercourse Crossings Inspections and Maintenance, Section 8.1 Road Signage, and Section 9.1 Accidents and Malfunctions.

Appendix 04 - Water Balance and Water Quality Modeling Tabular Data

This file contains approximately 500 pages. It is stated to contain tabular data. However, despite no reference to figures in the Appendix 4 filename, cover page, or elsewhere, starting on page 488, water balance figures are provided to 2027 for water volumes (CP1 to CP6, SP4, TIRI02), and water quality CP1 (TDS, Ammonia, Phosphorous, Arsenic, Aluminum, Cyanide, Copper, Lead, Nickel, Zinc) TIRI02 (TDS, Ammonia, Radium-226). This appendix needs to be renamed or otherwise indicate that these figures are included to ensure that reviewers can find these important figures more easily.

Recommendation:

(R-07) CIRNAC recommends that:

- a) Agnico Eagle's annual reports include a longitudinal cross-section through the TSF that shows the status of both cells of the TSF at year-end,



- b) Agnico Eagle's annual reports include information on water consumption by major category (e.g. camp, paste plant, Mill, etc.),
- c) The document control record of the Water Management Plan identifies any revisions made to any of the three plans included as appendices,
- d) Agnico Eagle explains why the Roads Management Plan was not updated in 2023 to include waterline-related activities and infrastructure along the All-Weather Access Road (AWAR) in 2023 and
- e) Appendix 4 should be renamed to include references to Figures.