



Fisheries and Oceans
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Programme de protection du poisson et de son habitat
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June 25, 2025

Your file Votre référence

2AM-MEL1631

Our file Notre référence

11-HCAA-CA7-00014

Nunavut Water Board
Attn: Richard Dwyer
Manager of Licensing
PO Box 119
Gjoa Haven, NU
X0B 1J0

Via email to: richard.dwyer@nwb-oen.ca

Subject: Comment Request for Agnico Eagle Mines Limited's Meliadine Gold Mine Project 2024 Annual Report

Dear Richard Dwyer,

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your request for comments on April 2, 2025. DFO has reviewed the above 2024 Annual Report in regards to its mandate, related to the management, protection and conservation of fish and their habitats.

Specifically, DFO has reviewed the following:

- Meliadine Gold Mine 2024 Annual Report
- Appendix 3 – 2025-2026 Mine Plan
- Appendix 5 – Water Balance and Water Quality Modeling;
- Appendix 6 – Annual Geotechnical Inspection Report
- Appendix 7 – 2023 Annual Geotechnical Report Agnico Eagle Responses and Action Table
- Appendix 8 – 2024 Annual Geotechnical Report Agnico Eagle Responses and Action Table
- Appendix 15 – 2024 Reportable Spills;
- Appendix 16 – 2024 Non-Reportable Spills;
- Appendix 18 – 2024 Aquatic Ecosystem Monitoring Program (AEMP) Report;
- Appendix 22 – 2024 Blast Monitoring Memo;
- Appendix 29-08 – Interim Closure and Reclamation plan
- Appendix 29-13 – Roads Management Plan
- Appendix 29-14 – Sediment and Erosion Management Plan

- Appendix 29-16 – Spill Contingency Plan
- Appendix 28-18 – Water Management Plan
- Appendix 29-19 – Water Quality and Flow Monitoring Plan
- Appendix 29-20 – Adaptive Management Plan for Water Management
- Appendix 29-21 – Aquatic Effects Monitoring Program (AEMP) Design Plan
- Appendix 29-23 – Environmental Management and Protection Plan
- Appendix 29-24 – Freshet Management Plan
- Appendix 30 – NIRB Project Certificate Tracking Table
- Appendix 31 – NWB Water Licence Tracking Table
- Appendix 32 – 2023 Annual Report Comments Tracking Table
- Appendix 33 – DFO Reporting Tracking Table

The Nunavut Water Board (NWB) invited parties to submit comments. DFO provides the following for the NWB's consideration.

DFO is generally agreeable with Agnico Eagle Mine's reporting and has the following comments or concerns to provide at this time.

Comment Number:	DFO-1
Subject/Topic:	Hydrological monitoring of Meliadine Lake and it's Outflow.
References:	Annual Report Section 3.2.5 Meliadine Lake Outflow Monitoring; Appendix 18 – 2024 Aquatic Effects Monitoring Program (AEMP) Report; Appendix 29-19 – Water Quality and Flow Monitoring Plan.
Comment:	<p>Hydrologic monitoring of water levels in Meliadine Lake, and flows at the 2 outlets of Meliadine Lake, began late in the open water season of 2024.</p> <p>Information provided in the 2024 Annual Report related to this hydrological monitoring was limited due to the late start of the monitoring program. It is planned for this information to be included in the 2025 Annual Report.</p> <p>It is unclear how this information will be reported and incorporated into the overall environmental management system in place at the Meliadine Mine. It is common place for a mines Aquatic Effects Management Program (AEMP) to include a hydrological component, which also allows for regular evaluation and potential response actions if detrimental effects are observed. Alternatively, the Meliadine mines Water Quality and Flow Monitoring Plan complements the AEMP.</p> <p>DFO would ultimately like to better understand some of the details of this monitoring program sooner than the submission of the 2025 Annual Report, including:</p>

	<ul style="list-style-type: none"> • what historical data is available and will be used for long term comparison, • the location where will this information be reported, • how mine related changes in water level will be responded to if determined to be detrimental to fish or fish habitat.
Conclusion/Request:	<p>Proponent to provide additional details on the hydrological monitoring, including:</p> <ul style="list-style-type: none"> • what historical data is available and will be used for long term comparison, • the location where will this information be reported, • how mine related changes in water level will be responded to if determined to be detrimental to fish or fish habitat. <p>To consider the analysis and reporting of this hydrology data under the AEMP, Water Quality and Flow Monitoring Plan, or provide rationale for another appropriate location.</p>

Comment Number:	DFO-2
Subject/Topic:	Catch per unit effort (CPUE).
References:	Appendix 18 – 2024 Aquatics Effects Monitoring Program AEMP report.
Comment:	<p>Catch per unit effort (CPUE) data can provide a loose measurement of fish abundance, and when collected and compared over a times series, can provide information on changes in fish abundance. CPUE data is being collected and provided in section 8.4.1 of Appendix 18 – 2024 Aquatics Effects Monitoring Program AEMP report, of the 2024 Annual Report. For small bodied fish, this is the third year of data collection, for large bodied fish this is the second year of data collection, however the report only provides data from 2024. Providing historical data in conjunction with current data would allow for this historical comparison.</p>
Conclusion/Request:	Proponent to provide each years CPUE data in the annual report so that comparison can be made between years.

Comment Number:	DFO-3
Subject/Topic:	Culverts Repair and Installation
References:	Annual Report Section 2.2.1 Culvert repairs work update

Comment:	<p>A total of six culverts along the All Weather Access Road (AWAR), Rankin Inlet Bypass Road (RIBR), and Exploration (EXPLO) roads have previously been identified as being undersized for flow, showing signs of erosion.</p> <p>Under DFO file # 23-HCAA-02631, AWAR 10 was installed in the winter of 2024 and due to delays and work proceeding under DFO file # 24-HCAA-01238 that culvert 7 on the AWAR will not be installed. Culvert RIBR 11 has not yet been installed, and is planned for 2025.</p> <p>Under DFO file # 24-HCAA-02901, two additional culverts were identified as needing replacement (AWAR 8.8, EXPLO 1.1) and one new culvert needing installation (AWAR 15.4). These culvert installations are planned for 2025.</p> <p>These issues were identified in 2023, and are blocking flow causing ponding of water at identified locations. In 2024 this resulted in a discharge of water containing elevated TSS at location AWAR 8.8 as described in Spill Report # 2024-463.</p> <p>DFO would like to know when these culverts are planned for installation and looks forward to receiving the final design reports under the Water Licence process.</p>
Conclusion/Request:	Proponent to confirm when culvert installation is planned for in 2025.

If you have any questions with the content of this letter, please contact Derek Donald by phone at 403-827-6781, or by email at Derek.Donald@dfo-mpo.gc.ca. Please refer to the file number referenced above when corresponding with the Program.

Sincerely,



Jennifer Loughery
Acting Senior Biologist
Fish and Fish Habitat Protection Program
Fisheries and Oceans Canada

CC:

José Audet-Lecouffe, Fisheries and Oceans Canada

Derek Donald, Fisheries and Oceans Canada