



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-MEL1631
Our file - Notre référence
GCDOCS# 144808560

July 10, 2026

Richard Dwyer
Manager of Licensing
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 Review of the Annual Report for Meliadine Gold Mine, Type A Water Licence No. 2AM-MEL1631

Dear Richard Dwyer,

Thank you for the 7 April 2026 invitation to review the Annual Report, submitted by Agnico Eagle Mines (AEM), for Type A Water Licence No. 2AM-MEL1631.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application 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.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact William Quere at william.quere@rcaanc-cirnac.gc.ca or (873) 452-1981 Or Andrew Keim at (867) 975-4550 or Andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

William Quere, BSc
Regional Coordinator

Canada 



Technical Review Memorandum

Date: 10 July 2026

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: William Quere – Regional Coordinator, CIRNAC

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

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

Agnico Eagle Mines' (Agnico Eagle) 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 Agnico Eagle on February 26, 2015. Agnico Eagle 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 meters of the surface, making them potentially mineable by open-pit methods. Additionally, due to their deeper mineralization, they can be mined using underground methods. The current mineral reserves are primarily located in the Tiriganiaq deposits, both underground and at open-pit depths. In Phase 1 of the mine, the ore is sourced underground through access declines, utilizing long-hole mining methods. In Phase 2, the ore will be sourced from both underground and open-pit mines. 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, as well as 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 comprises of a camp, land farm, landfill, incinerator, and fuel tank farms, all of which were completed in late 2017. Additionally, the underground portal has been operational 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 encompasses quarry operations that commenced in 2017, as well as a laydown area and fuel tank farm, which were 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 require amendment to the Type A Water Licence (collectively referred to as 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 2AMMEL1631 to regulators and interested parties. The Minister of Northern Affairs approved the amended 2AM-MEL1631 Water Licence on November 22, 2024.

The Meliadine Gold Mine Project is in the early stages of its life cycle and 2025 was the sixth full year of milling operations. Activities in 2025 included ongoing exploration (278 diamond drill holes, no trenching), construction of mine site surface components, construction of the waterline, and ongoing development of the underground and open pit mines, waste rock and tailings storage facilities.

Mining activities in 2025 included continued open pit mining operations at the Tiriganiaq Open Pit #1 (TIRI01) that generated: 561,000 tonnes of ore and 3,995,000 tonnes of waste rock. No overburden waste was mined from TIRI01 in 2025.



No overburden waste, waste rock, or ore were mined from the Tiriganiaq Open Pit #2 (TIRI02) as mining activities at TIRI02 have been paused since Q2, 2021 and TIRI02 is currently used for underground saline contact water storage.

Commercial gold production from Pump Open pits started in 2025 with total of 561,000 tonnes of ore, 546,414 tonnes of overburden waste, and 675,162 of waste rock excavated from PUMP01, and a total of 561,000 tonnes of ore, 450,914 tonnes of overburden waste, and 135,308 of waste rock excavated from PUMP02 pit.

Underground mining activities in 2025 resulted in 1,490,386 tonnes of ore and 439,301 tonnes of underground waste mined and trucked to surface.

Tailings placement (as per Section 4.4.1) into the TSF continued throughout the year and totaled 1,272,000 m³ (2,098,000 t) for a remaining design capacity of 654,000 m³ (1,079,000 t). In 2025, a total of 190,607 m³ was used as backfill.

Off-site operations for the year included continued use of the AWAR, and operation of the Itivia fuel storage facility.

CIRNAC provides the following comments and recommendations pertaining to the application package. 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	Details Regarding Waterline Operation
R-02	Dewatering of TIRI02, Saline Water and Sludge Management
R-03	Tailings Storage Facility (TSF) Remaining Storage Capacity and Expansion Plans
R-04	Potentially Acid Generating (PAG)/Uncertain Material in Construction
R-05	Marine Discharge - Update on Status of <i>Acartia tonsa</i>
R-06	Increase Fresh Water Demand (for Domestic Use)
R-07	Use of Mined Out Pits for Saline Water Storage
R-08	Use Waterline to Minimize/Eliminate Discharge to Meliadine Lake
R-09	Report Improvements/Clarifications

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
Meliadine Gold Mine – 2025 Annual Report, Main Document, V1	AEM, March 2025
Appendix Documents	
Appendix 01 - 2025 Meliadine Gold Mine Annual Report Appendix Summary Table	AEM, March 2026
Appendix 02 - 2024 Drill Sites and Cuttings Locations	AEM, March 2026
Appendix 03 - 2025-2026 Mine Plan	AEM, March 2026
Appendix 04 - General Site Layout	AEM, March 2026
Appendix 05 - Water Balance and Water Quality Modeling Tabular Data and Figures	AEM, March 2026
Appendix 06 - 2025 Annual Geotechnical Inspection	Tetra Tech, 4 March 2026
Appendix 07 - 2024 Annual Geotechnical Report Agnico Eagle Responses and Action Table	AEM, March 2026
Appendix 08 - 2025 Annual Geotechnical Report Agnico Eagle Responses and Action Table	AEM, March 2026
Appendix 09 - 2024 Metal Leaching and Acid Rock Drainage Monitoring Report	AEM, March 2026
Appendix 10 - 2024 Results of the Tailings Supernatant Sampling	AEM, March 2026
Appendix 11 – WRSF Plans and Sections at the	AEM, March 2026



Document Title	Author, File No., Rev., Date
End of 2025	
Appendix 12 - TSF Plans and Sections at the End of 2025	AEM, March 2026
Appendix 13 - Shipping Documentation	AEM, March 2026
Appendix 14 - 2025 Stack Testing Report	AEM, March 2026
Appendix 15 - 2025 Reportable Spills	AEM, March 2026
Appendix 16 - 2025 Non-Reportable Spills	AEM, March 2026
Appendix 17 - 2025 Mock Spill Scenario Report	AEM, March 2026
Appendix 18 - 2025 Aquatic Effects Monitoring Program (AEMP) Report	Azimuth, 27 March 2026
Appendix 19 - 2025 Water Monitoring Stations Results	AEM, March 2026
Appendix 20 - 2025 DDH Water Samples Results	AEM, March 2026
Appendix 21 - 2025 Calibration Data	AEM, March 2026
Appendix 22 - 2025 Blast Monitoring Report	AEM, March 2026
Appendix 23 - 2025 Noise Monitoring Report	AEM, March 2026
Appendix 24 - 2025 Air Quality Monitoring Report	AEM, March 2026
Appendix 25 - 2025 Terrestrial Environment Management and Monitoring Plan Report	WSP, 30 March 2026
Appendix 26 - 2025 Wildlife Observations	AEM, March 2026
Appendix 27 - 2025 Marine Mammal and Seabird Observation Report	ERM, March 2026
Appendix 28 Management Plans (Revised & Submitted with 2025 Annual Report)	
Appendix 28-01 Blasting Monitoring Program, V8	AEM, March 2026
Appendix 28-02 Explosives Management Plan, V12	AEM, January 2026
Appendix 28-03 Hazardous Materials Management Plan, V7	AEM, March 2026
Appendix 28-04 Mine Waste Management Plan, V14	AEM, March 2026
Appendix 28-05 Oil Pollution Emergency Plan and Oil Pollution Prevention Plan, V12	AEM, March 2026
Appendix 28-06 Ore Storage Management Plan, V8	AEM, March 2026
Appendix 28-07 Roads Management Plan, V12	AEM, March 2026
Appendix 28-08 Spill Contingency Plan, V17	AEM, March 2026
Appendix 28-09 Terrestrial Environment Management and Monitoring Plan Erratum	AEM, March 2026
Appendix 28-10 Water Management Plan, V17	AEM, March 2026
Appendix 29 - NIRB Project Certificate Tracking Table	AEM, March 2026
Appendix 30 - NWB Water Licences Tracking	AEM, March 2026



Document Title	Author, File No., Rev., Date
Table	
Appendix 31 - 2024 Annual Report Comments Tracking Table	AEM, March 2026
Appendix 32 - DFO Reporting Tracking Table	AEM, March 2026
Appendix 33 - 2024 2AM-MEL1631 WLA Commitments Tracking Table	AEM, March 2026
Appendix 34 – 2025 Community Engagement Table	AEM, March 2026
Appendix 35 - 2024 Socio Economic Pamphlet	AEM, March 2026
Appendix 36 - 2025 Kivalliq Elders Advisory Committee Summary	AEM, March 2026
Appendix 37 - 2025 TAG Annual Report	AEM, March 2026
Appendix 38 - 2024 Socio-Economic Monitoring Report	Aglu Consulting and Training Inc., with ERM, March 2026
Appendix 39 - 2025 Training.pdf	AEM, March 2026
Appendix 40 - Inuktitut Summaries of Monitoring Results	AEM, March 2026
Nunavut Water Board Amended Water Licence No: 2AM-MEL1631	Issued 25 October 2024
CIRNAC's Review of the 2024 Annual Report for Meliadine Gold Mine Project, Type A Water Licence No. 2AM-MEL 1631	CIRNAC, 18 July 2025
AEM's Responses to Comments on the Meliadine Mine 2024 Annual Report for Water Licence No. 2AM-MEL 1631	AEM, 18 August 2025
CIRNAC's Response to AEM's Responses to Comments on the Meliadine Mine 2024 Annual Report for Water Licence No. 2AM-MEL1631	CIRNAC, 18 September 2025



C. RESULTS OF REVIEW

1. Details Regarding Waterline Operation

Comment:

The 2023 Annual Report stated that saline water discharge would commence in 2025. The 2024 Annual Report included commissioning the waterline as part of planned activities for 2025. The 2025 Annual Report states that planned activities for 2026 include minor construction, hydrotesting, and commissioning of the waterline.

Section 3.2.1 of the 2025 Annual Report states that the maximum predicted volume of Collection Pond 1 will occur in 2027 due to the combined expanded mine footprint and the priority use of the waterline for dewatering of TIRI02 (i.e., instead of reducing discharge to Meliadine Lake).

Section 3.2.2 of the 2025 Annual Report states that TIRI02 pit currently serves as the primary saline contact water storage pond until it is fully dewatered in 2029. A maximum predicted pit water volume of 1.29 Mm³ will be reached in June 2027 prior to initiation of TIRI02 dewatering, which will transfer a total of 2.2 Mm³ of saline water to WES02 over a two-year period from 2027-2029; however, there is no mention of waterline discharge at Itivia.

Appendix 28-10, Section 4.1 Key Water Management Activities, Table 12 Major Water Management Activities and Sequence, shows “Saline Effluent Treatment Plant – Water Treatment Complex (SETP-WTC) discharge through waterline” commencing in 2027. Section 5.3.2 notes that the Water Licence Amendment Water Balance and Water Quality Model (WLA WBWQM) assumes that discharge from the waterline begins in 2027. However, Figure 9 of the 2025 Annual Report, which illustrates predicted water levels in TIRI02 and WES02, suggests that water discharge from WES02 begins in 2028.

CIRNAC is concerned that changes around the waterline has introduced complications that have not been addressed.

Recommendation:

(R-01) CIRNAC recommends that, given the importance of saline water discharge to the marine environment and the various changes in design plus the delay in schedule related to the start and operation of the waterline, Agnico Eagle:

1. Provide an assessment of risks associated with delayed commissioning of the saline discharge waterline, including implications for TIRI02/WES02 storage capacity, saline water quality evolution, and long-term dependence on interim onsite storage and treatment systems.



2. Clarify the status of the waterline and provide additional details on:
 - a) Planned 2026 and 2027 construction and commissioning activities,
 - b) Schedules for the start of saline water and contact water discharge at Itivia, and
 - c) Expected operational practices once the waterline is available for discharge at Itivia (e.g., how will flow rates and content be determined; will the line operate continuously at the same rate for the entire season or will flows vary; will both lines be used at all times or will there be periods of one line operation; is it possible to use one line for saline and one for contact water or will contact water be mixed with saline water for discharge, etc.).

2. Dewatering of TIRI02, Saline Water and Sludge Management

Comment:

The 2025 Annual Report introduces a significant change to the dewatering of TIRI02. In all prior annual reports, Agnico Eagle indicated that dewatering of TIRI02 would commence via marine discharge at Itivia upon completion of the waterline. The 2025 Annual Report however, states that saline contact water will be stored in TIRI02 to a maximum predicted pit water volume of 1.29 Mm³ prior to late 2027 initiation of transfer to WES02 over a two-year period to 2029.

The concern is that there is no mention of TIRI02 saline water discharge to Itivia. Figure 9 of the 2025 Annual Report provides predicted water levels in TIRI02 and WES02. The figure illustrates volume of saline water drawdown of TIRI02 that matches the increase in saline water storage in WES02, with drawdown of WES02 commencing in 2028. Based on the information provided, it is not clear as to why TIRI02 water is being transferred to WES02 over a two-year period rather than being pumped to and treated at the Saline Effluent Treatment Plant – Water Treatment Complex (SETP-WTC) and discharged after treatment at Itivia.

TIRI02 has been used for sludge disposal since 2021. It is not clear what sludge disposal practices will be implemented during or after TIRI02 saline water discharge.

Recommendation:

(R-02) CIRNAC recommends that Agnico Eagle:

- a) Provide a detailed discussion on the rationale and basis for TIRI02 water transfer to WES02 instead of drawdown via pumping to the SETP-WTC and discharge at Itivia.



- b) Provide details on when discharge of saline water from WES02 is expected to begin and the expected rate of discharge.
- c) 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.

3. Tailings Storage Facility (TSF) Remaining Storage Capacity and Expansion Plans

Comment:

Section 4.4.1 of the 2025 Annual Report states that by the end of 2025, tailings placement into the TSF totaled 1,272,000 m³ (2,098,000 t) with facility remaining design capacity of 654,000 m³ (1,079,000 t). As shown in Table 4-1 of Appendix 28-04 (Mine Waste Management Plan) at the end of 2025 Agnico Eagle plans for six more years of tailings deposition to the TSF requiring additional storage of approximately 15.6 Mt.

Table 4-1 also shows that 1,760,000 t tailings are planned for deposition in the dry stack in 2026 alone, which exceeds remaining design capacity by more than 681,000 t.

Notwithstanding the near term need for additional storage in excess of end of 2025 remaining capacity, and the significant additional amount of tailings storage volume required beyond what is already stored in the dry stack (~15.6 Mt) over the next six years, the 2025 Annual Report is silent on how Agnico Eagle intends to store these tailings and the potential implications associated with the 1.6 times expansion in storage of tailings.

Recommendation:

(R-03) CIRNAC recommends that Agnico Eagle provide a summary discussion of its plans for expanding the approved TSF capacity to full life of mine tailings deposition capacity, contingency storage availability, and the schedule/technical basis for future tailings storage expansion given the limited remaining capacity of approximately 654,000 m³ and significant additional capacity requirement.

4. Potentially Acid Generating (PAG)/Uncertain Material in Construction

Comment:

Waste rock from the open pits is used for construction of infrastructure. During construction, a sampling program is conducted to ensure that only rock classified as non-Potentially Acid Generating (non-PAG) is used in the construction. Sampling conducted in both 2024 and 2025 on construction rock returned a small number of samples as PAG or Uncertain (2024 – one Uncertain sample from Pump Road; 2025 – two Uncertain and two



PAG samples). As noted in Section 5.4 of Appendix 9 of the 2025 Annual Report, follow-up sampling completed in 2025 on the Uncertain result collected from Pump Road in 2024 returned two out of eight confirmatory samples as Uncertain or PAG and revealed that there is a section of approximately 20 m between 1+170m and 1+190m that contains PAG material. Agnico Eagle has indicated that this material will be removed during closure and likely before the onset of any acid generation from the rock.

Given that material used in construction is sampled and classified in the pits before use in construction, it is not clear how PAG/Uncertain material was used to construct infrastructure.

Recommendation:

(R-04) CIRNAC recommends that Agnico Eagle:

- a) Provide clarification regarding the identification of PAG/Uncertain construction materials associated with Pump development infrastructure and the proposed long-term management strategy, including confirmation of whether additional similar materials may remain unidentified within operational infrastructure.
- b) Provide clarification on why the material was mis-characterized and what changes to the management plans have been implemented to prevent similar issues occurring in the future.

5. Marine Discharge - Update on Status of *Acartia tonsa*

Comment:

The need to discharge significant volumes of saline water at up to 20,000 m³ per day to the marine environment is one of the most significant variances to the Final Environmental Impact Statement (FEIS) water management plans and predictions for the Meliadine mine.

The inability to comply with Environment and Climate Change Canada (ECCC) requirements for *Acartia tonsa* testing has been a critical constraint since 2022 to the planned discharge of saline water to the marine environment at Itivia. Given its importance, it was expected that the 2025 Annual Report would provide an update on this issue.

Review of the 2025 Annual Report found no discussion on the status of Agnico Eagle's efforts to meet ECCC's *Acartia tonsa* requirements for acute toxicity testing.

The absence of an update on where Agnico Eagle stands with regard to being able to comply with the *Acartia tonsa* toxicity testing requirements results in significant uncertainty as to Agnico Eagle's plans and schedules for initiating marine discharge to remove



existing stored saline water from TIRI02, or WES02 plus additional saline water inflows from ongoing and future underground mining.

Recommendation:

(R-05) CIRNAC recommends that, given the importance of saline water discharge to the marine environment, Agnico Eagle provide updated information regarding the status of *Acartia tonsa* toxicity management, including contingency measures if discharge toxicity objectives cannot be consistently achieved.

6. Increase Fresh Water Demand (for Domestic Use)

Comment:

As required by Water Licence 2AM-MEL1631, Schedule B, Item 2: Agnico Eagle reported that a total of 581,166 m³ of freshwater was withdrawn from Meliadine Lake (MEL-11) in 2025, or approximately 53% of the total authorized volume of fresh water (1,100,296 m³/year) under the current Licence. The monthly distribution of freshwater use is presented in Table 2. The 2025 withdrawal is consistent with that reported in the 2024 Annual Report.

As required by Water Licence 2BE-MEL2434 Part B, Items 2b and 2c: Agnico Eagle also reported annual and monthly distribution water withdrawal volumes from MEL-2 in Table 3 totalling 11,613 m³ which was well below the total authorized volume of 299 m³/day, or 109,135 m³/year. It is noted however, that the 2025 withdrawal of 11,613 m³ while only 11% of total annual approved volume, is nevertheless 3.7 times higher than MEL-2 withdrawals in 2024.

Review of Table 3 for 2024 and 2025 show significant increases in MEL-2 freshwater withdrawals in March, April, September and October as shown below, with April's withdrawal of 4,128 m³ (more than 4 times 2024) at an equivalent rate of 137.5 m³ per day, or 46% of the current authorized withdrawal rate of 299 m³/day.

No information is provided on the cause of this significant year over year, and month over month increase.

Table 3: Monthly and annual quantity of freshwater obtained from Meliadine Lake at monitoring station MEL-2 in 2024 under Licence B.

	January	February	March	April	May	June	July	August	September	October	November	December	2024 Total
Water withdrawn, m ³	0	0	385	1,001	182	0	497	788	314	0	0	0	3,167



Table 3: Monthly and annual quantity of freshwater obtained from Meliadine Lake at monitoring station MEL-2 in 2025 under Licence B.

	January	February	March	April	May	June	July	August	September	October	November	December	2025 Total
Water withdrawn, m ³	0	137	2,357	4,128	760	0	509	824	1,897	1,003	0	0	11,613

Recommendation:

(R-06) CIRNAC recommends that, while well below the approved amount of water use for domestic purposes, Agnico Eagle provide information that explains the increase in domestic monthly and annual total water use from 2024 to 2025.

7. Use of Mined Out Pits for Saline Water Storage

Comment:

Section 3.1 of Appendix 28-10 states that saline contact water from underground is collected in underground sumps, transported to a clarification system, and subsequently recirculated for use in various underground operations. Excess saline contact water is pumped to surface and management is planned as follows:

- Stored in Tiriganiaq Pit 2 (TIRI02) until it is unavailable.
- The PUMP02 pit will be used as a saline water sump once mining of the PUMP02 deposit is complete and will continue to capture saline runoff from the temporary Pump Underground WRSF.
- The WES02 pit will also be used as a saline water reservoir once mining of the WES02 deposit is completed.

Excess saline contact water stored on surface is treated at the Saline Effluent Treatment Plant (SETP). Further details are found in the Groundwater Management Plan. Former plans to use Lake B7 as the primary surface saline storage plan is no longer in place and Lake B7 will become CP7 and function as a surge pond for surface contact water.

Section 3.7 of Appendix 28-10 notes that mined-out pits play a critical role in the integrated water management strategy, serving as both temporary and long-term storage facilities for contact and saline water. These pits are repurposed to manage water volumes generated during operations, thereby reducing the need for additional surface infrastructure.

- PUMP02 pit will be used as a saline water sump once mining of the deposit is complete and will capture saline runoff from the Pump Underground WRSF.



- Once mining in WES02 is completed, it will replace TIRI02 as the primary storage facility for excess saline contact water pumped from the underground mine, which will later be treated at the SETP before discharge to Itivia Harbour.
- WES03 functions as an intermediate reservoir for surface contact water collected from CP3, CP4, CP5, and CP8. During the open-water season only, water from the Sewage Treatment Plan (STP) will be sent to WES03. Water stored in WES03 will be discharged to Itivia Harbour via the waterline.

As stated above, the use of pits for short- and long-term storage of saline water is now considered a key/critical component of Agnico Eagle's site water management. This is a significant change from the FEIS and previous concepts which were based on short-term retention in much smaller temporary saline water holding ponds prior to treatment and disposal.

Recommendation:

(R-07) CIRNAC requests that Agnico Eagle confirm that it has assessed the potential impacts of saline water storage in all of the individual open pits intended to be used for this purpose and has also considered any potential cumulative effects of storing underground saline waters in multiple pits over the life of mine as presently planned.

8. Use Waterline to Minimize/Eliminate Discharge to Meliadine Lake

Comment:

The 2025 Annual Report is silent on future efforts to minimize or eliminate contact water discharge to Meliadine Lake, which Agnico Eagle had committed to during the Adaptive Management Plan review process and as per Project Certificate Terms and Conditions 25a which states "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."

As noted earlier in CIRNAC TRC #2, Agnico Eagle's Annual Report is vague as to when pipeline discharge to Melvin Bay is expected to occur. However, it is clear that saline water will be transferred to WES02 starting in late 2027 over a two-year period to 2029. From Figure 9 it can then be inferred that discharge of treated saline water from WES02 will begin in mid-2028.

Based on CIRNAC's understanding of Agnico Eagle's plans for saline water transfer from TIR02 to WES02 from 2027 to 2029, and that the waterline is being commissioned in 2026, it appears to CIRNAC that the waterline could therefore be available for dedicated use to minimize or eliminate discharges to Meliadine Lake in 2027. However, this needs to be confirmed by Agnico Eagle or dispositioned if otherwise.



Recommendation:

(R-08) CIRNAC recommends that Agnico Eagle provide information on plans for minimizing or eliminating discharges to Meliadine Lake starting in 2027 via the waterline. Especially in the event that the waterline is not being used for discharge of stored saline water.

9. Report Improvements/Clarifications

Comment:

From review of the 2025 Annual Report, the following editorial and technical comments are provided for awareness and to reduce potential confusion that may exist with respect to the following.

Summary of Mining Activities states that: a) in 2025 continued open pit mining operations at TIRI01 generated 561,000 t ore. This is the same number reported in 2024 and is inconsistent with Table 3.2 of Appendix 28-06 that shows 658,472t. However, as the 2025 value in Table 3.2 is not indicated as being “actual” it is unclear what actual quantity of ore was generated in 2025 [note the same number of 561,000t is also given for ores generated at each of PUMP01 and PUMP02 which are shown Table 3.2 as being 146,747t and 23,230t respectively]; and b) remaining “design capacity” at end of 2025 is of 654,000 m³ (1,0790,000 t). In regard the 1,0790,000 CIRNAC assumed this should read 1,079,000 t.

Ore Stockpiles at Yearend: Table 10 of the Annual Report shows OP1&OP2 ore stockpile at 3,203 t at the end of December 2025; however, Table 4.4 of Appendix 28-06 shows yearend ore storage of 460,000 t. Note also that Table 4.4 does identify 2025 numbers as being actuals and its footnote refers to V6 while the current version is V8.

Tailings / Waste Rock Placement at TSF: Section 4.4.1 has several numeric errors: a) remaining design capacity 654,000 m³ is shown as equal to 1,0790,000 t; and b) waste rock total of 764,000 m³ is stated to equal 267,000 t.

Waste Management: page 47 of the Annual Report notes that waste placed in the landfill during 2025 is estimated at 3,504 m³, while it was estimated at 4,978 m³ in 2024”. It goes on to say “The increase of waste landfilled compared to 2024 may be due to construction activities which took place in 2025” and provides an explanation for the increase. However, this is inconsistent with the numbers provided which show that the amount of waste placed in 2025 is less than 2024.



Non-Reportable Spills: The only discussion in the annual report is Agnico Eagle's statement that "non-reportable spills are summarized in Appendix 16". This appendix is a twenty-page table listing all 149 non-reportable spills along with the date, contaminant, estimated quantity, exact location, description of Incident, and description of immediate action. This is very good and detailed information but it is not a summary of non-reportable spills.

Monitoring: The calculated total dissolved solids (TDS) concentrations reported for MEL-14 in Section 7.3.1.10 (2025 average of 1,072 mg/L and maximum 2,000 mg/L) are incorrect and should be 987 mg/L for the average and 1,900 mg/L for the maximum as per Appendix 19. Agnico Eagle has reported 'TDS concentrations' instead of 'calculated TDS concentrations' in the Annual Report.

Management Plans: Document Control for updated plans is generally appropriate with the exception of: Appendices 28-01 and 28-02 which have blanks in the "section" and "page" columns followed by General Revision; and Appendix 28-4 states "all" in the "Section" and "Page" columns.

Recommendation:

(R-09) CIRNAC requests that Agnico Eagle:

- a) Clarify the tonnes of ore generated from each of TIRI02, PUMP01, and PUMP02
- b) Clarify the numeric values that should have been reported with respect to tailings and waste rock totals for the tailings storage facility (TSF).
- c) Provide a clear statement on how "design capacity" relates to approved tailings volumes.
- d) Clarify the quantity of ore stored at yearend 2025 and whether Table 4.4 of Appendix 28-6 is most recent or requires updating.
- e) Clarify inconsistency between the waste management quantities and text presented on page 47 of the Annual Report.
- f) Provide a discussion that summarizes the listed non-reportable spills (similar to that provided in the Meadowbank Complex 2024 Annual Report) and how Agnico Eagle uses this information.
- g) Ensure that appropriate values from Appendix 19 are used in future when reporting calculated TDS.
- h) Provide more focussed Document Control information to the degree reasonably possible.