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Programme de protection du poisson et de son habitat
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July 15, 2026

Your file *Votre référence*
2AM-MEL1631

Our files *Notre référence*
11-HCAA-CA7-00014,
24-HCAA-01238,
25-HCAA-00583

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 2025 Annual Report

Dear Richard Dwyer,

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received on April 15, 2026, your request for comments on Agnico Eagle Mine's (AEM) Meliadine Gold Mine's (the Project) 2025 Annual Report. DFO has reviewed the above 2025 Annual Report in regard to its mandate, i.e. the management, protection and conservation of fish and their habitats.

Specifically, our review focused on the following:

- Meliadine Gold Mine 2025 Annual Report
- Appendix 3: 2026-2027 Mine Plan
- Appendix 5: Water Balance and Water Quality Modeling Tabular Data and Figures
- Appendix 18: 2025 Aquatic Effects Monitoring Program (AEMP) Report
- Appendix 22: 2025 Blast Monitoring Report
- Appendix 28: Management Plans
- Appendix 30: NWB Water Licences Tracking Table
- Appendix 31: 2024 Annual Report Comments Tracking Table
- Appendix 32: DFO Reporting Tracking Table
- Appendix 33: 2024 2AM-MEL1631 WLA Commitments Tracking Table
- Appendix 34: 2025 Community Engagement 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 AEM's reporting and has the following comments or concerns to provide at this time.

Comment Number:	DFO-1
Subject/Topic:	Hydrology monitoring and modeling - Meliadine Lake, Meliadine River, and Diane River.
References:	• Annual Report; Appendix 18 – 2025 Aquatic Effects Monitoring Program (AEMP) Report; • Appendix 28: Management Plans • Water Quality and Flow Monitoring Plan March 2025 (Version 5). • Appendix 31 - 2024 Annual Report Comments Tracking Table
Comment:	Hydrology monitoring of Meliadine Lake and its outflow rivers (Meliadine River and Diane River) only began in 2024 despite the mine being approved for operational water withdrawal in 2016, mining operations beginning in 2019, and being approved in 2024 for considerable water withdrawal volumes at closure. Water withdrawal can impact fish and fish habitat through a decrease of under-ice dissolved oxygen, loss of overwinter habitat and littoral habitat, and change in downstream flow. The current and potential impacts of water withdrawal for the Meliadine Mine are largely unknown due to the lack of a hydrology monitoring program and appropriate modeling of Meliadine Lake water levels, and the Meliadine River and Diane River discharge rates. Following the 2024 annual report review, AEM stated they were developing a water balance model for the Meliadine Lake, and this information would be included in the next update of the Water Quality and Flow Monitoring Plan and reported in the annual Report. An updated Water Quality and Flow Monitoring Plan was not provided, and this information was not included in the 2025 Annual Report. This information

	was later included in the Water Licence Amendment Application as a separate Meliadine Lake Hydrology Model. DFO wants to emphasize the importance of conducting this hydrology monitoring and modeling for understanding and mitigating the Projects risks to fish and fish habitat. It is important that this information is collected in a clear and reliable manner that can easily be reviewed by regulators, and that informative modeling be conducted with the data collected. DFO has included additional details in the Water Licence Amendment Application Information Requests, but wants to emphasize the importance of the following components in managing industrial water withdrawal from Meliadine Lake. 1. The hydrology monitoring program should: a. be included in the AEMP so it can be reviewed and reported on in a clear and reliable manner; b. include a Response Plan for water discharge rates in the Meliadine River and Diane River; and c. consider both summer and winter (under-ice) conditions. 2. The hydrology model should: a. compare baseline (no water use) conditions to different impact (water use) scenarios; b. consider both summer and winter (under-ice) conditions; c. model discharge rates for the Meliadine River and Diane River, in addition to Meliadine Lake water levels; and d. include discussion related to DFO guidance on water withdrawal thresholds where at minimum AEM is maintaining a cumulative instantaneous flow alteration below 10% and mean annual discharge alteration below 30%, in the Meliadine River and Diane River, under different water use and climate scenarios. 3. A pit back-flooding plan should: a. be developed well in advance of these activities to allow time for review and consideration;
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	b. consider both summer and winter (under-ice) conditions; c. be flexible and adaptive; and d. include trigger-actioned responses that mitigate impacts to flow rates in the Meliadine River and Diane River.
Conclusion/Request:	DFO requests that the Proponent provide as part of their Water Licence Amendment Application: 1. A hydrology monitoring program as detailed above; 2. An updated Meliadine Lake Hydrology Model as detailed above; and 3. A Pit Back-Flooding Plan as detailed above. This information is needed by DFO to: 1. Understand and assess the logistics of the monitoring program in question; 2. Understand and assess current and potential future impacts of water withdrawal; and 3. Understand and assess planning for future back-flooding activities. DFO would like to emphasize the importance of this information, particularly for understanding the potential impacts of the operational and closure water withdrawal rates that were approved in 2024, but have not yet been properly assessed.

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

Sincerely,



Dana Harris
A/ Senior Biologist
Fish and Fish Habitat Protection Program
Fisheries and Oceans Canada

CC:
Derek Donald, Fisheries and Oceans Canada