August 14th, 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119 Gjoa Haven
Nunavut NU X0B 1J0

RE: *Agnico Eagle Mines Ltd.'s 2025 Annual Report for water licence 2AM-MEL1631*

Dear Mr. Hunter,

Agnico Eagle Mines Limited (Agnico Eagle) thanks the Nunavut Water Board (NWB) for the opportunity to address comments received for Agnico Eagle's Meliadine Gold Mine 2025 Annual Report.

The following information and comments are intended to address comments outlined in the below referenced letters.

260715 2AM-MEL1631 2025 Annual Report DFO Comments-IMLE
260710 2AM-MEL1631 2025 Annual Report CIRNA Comments-IMLE

Should you have any questions or require further information, please do not hesitate to contact us.

With my best regards,

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MELIADINE

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Fisheries and Oceans Canada (DFO)

DFO-1: Hydrology monitoring and modeling - Meliadine Lake, Meliadine River, and Diane River

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;
   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 backflooding 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.

Agnico Eagle Answer

Agnico Eagle thanks DFO for their comments. As noted by DFO, the requested information falls within the scope of the Water Licence Amendment application and is therefore more appropriately addressed through that process. As such, responses to these comments will be discussed as part of the Water Licence Amendment review rather than the 2025 Annual Report review process.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

CIRNAC-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.).

Agnico Eagle Answer

Agnico Eagle thanks CIRNAC for their comments and refers CIRNAC to the response provided on August 3, 2026, to Comment CIRNAC-1 submitted through the NIRB review of the 2025 Annual Report.

1. Agnico Eagle confirms there is sufficient storage capacity until the start of discharge via the waterline anticipated in 2027 as discussed in Section 3.2.2 of the 2025 Annual Report. A maximum predicted pond volume of 1.29 Mm^3 is reached in June 2027 prior to the initiation of TIRI02 dewatering. That maximum predicted volume remains below the maximum available storage volume of 1.6 Mm^3. WES02 Pit will provide an additional available storage volume of 1.45 Mm^3.

The main implication of a delay would be to postpone the return to mining in Tiri02, currently planned for 2029. At this point, there is no anticipated evolution of the saline water quality outside what has been described in the Water Balance and Water Quality Model (WBWQM) (see Section 3.2.5 and Appendix 5 of the 2025 Annual Report).

2. a) Waterline construction and commissioning activities are expected to be completed in 2026, as presented in Section 2.1.2.1 of the Annual Report.

b) Discharge of saline and surface contact water at Itivia Harbour via the waterline is anticipated to start during the open water season of 2027.

c) Expected operational practices for the waterline are described in the Adaptive Management Plan for Water Management. During normal operating conditions, the capacity is approximately 6,000 to 12,000 m^3/day of saline water and up to 14,000 m^3/day of surface contact water, for a total up to a designed capacity of 20,000 m^3/day.

Discharge rates may vary depending on infrastructure availability. Downtimes may occur due to electrical shutdowns and required maintenance, for example. Agnico Eagle will strive to achieve a maximum possible availability of the SETP-WTC and waterline.

During normal operating conditions, both lines are expected to be operated at the same time for optimization of treated contact water discharge.

CIRNAC-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.

Agnico Eagle Answer

Agnico Eagle thanks CIRNAC for their comments and refers CIRNAC to the response provided on August 3, 2026, to Comment CIRNAC-2 submitted through the NIRB review of the 2025 Annual Report.

a) Drawdown and discharge to Itivia Harbour following treatment at the SETP-WTC is anticipated to commence from TIRI02 during the open water season of 2027. The transfer of saline water from TIRI02 to WES02 in addition to discharge to Itivia Harbour is to allow mining to be restarted in TIRI02 in 2029, prior to all saline water being discharged to Itivia.

b) Discharge of saline water from WES02 is anticipated to start in 2029 through the SETP-WTC and will proceed as per the Adaptive Management Plan for Water Management. As noted in response to comment CIRNAC-1, during normal operating conditions, the discharge rate is

approximately 6,000 to 12,000 m^3/day of saline water and up to 14,000 m^3/day of surface contact water, for a total up to a designed capacity of 20,000 m^3/day.

c) Sludge from the WTC will continue to report to TIRI02 while it is still acting as a saline pond and will transfer to WES02 once that pit is ready to receive water.

To summarize and for clarity, discharge from TIRI02 to Itivia Harbour after treatment at the SETP-WTC is anticipated to take place during the open water season of 2027 and 2028. Sludge from the WTC continue to report to TIRI02 during that time. Starting in 2029 and onward, discharge from WES02 to Itivia Harbour after treatment at the SETP-WTC will take place during the open water season. Sludge from the WTC will be reporting to WES02.

CIRNAC-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 m^3 (2,098,000 t) with facility remaining design capacity of 654,000 m^3 (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 m^3 and significant additional capacity requirement.

Agnico Eagle Answer

Agnico Eagle thanks CIRNAC for their comments and refers CIRNAC to the response provided on August 3, 2026, to Comment CIRNAC-3 submitted through the NIRB review of the 2025 Annual Report.

Section 4.3 of the Mine Waste Management Plan states, “detailed design of an expanded TSF is expected to be completed in Q1 2026.” The design for the TSF expansion was submitted to the NWB on April 15, 2026 and approved on June 23, 2026. The expanded design will be incorporated within the 2026 Annual Report. Consistent with this approach, detailed design reports for any future TSF expansions will be submitted to the NWB for review and approval a minimum of 60 days prior to implementation.

CIRNAC-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.

Agnico Eagle Answer

Agnico Eagle thanks CIRNAC for their comments and refers CIRNAC to the response provided on August 3, 2026, to Comment CIRNAC-4 submitted through the NIRB review of the 2025 Annual Report.

a) The identification of the PAG/Uncertain construction material was done in a post placement quality control check, in addition to the regular monitoring conducted on mined material as described the Mine Waste Management Plan. The total tonnage of Pump Road construction

material was used to calculate the sampling frequency in accordance with the Mine Environment Neutral Drainage (MEND) (2009) recommendation of 8 samples per 100,000 tonnes. The road was broken down in that many equally spaced sampling locations.

Though the material is sampled in the pits before use for construction, as due diligence, this additional sampling program will continue as the mine expands to confirm that rock used for construction is classified as non-PAG. At this point, there is no reason to believe that any other areas outside of the ones marked for follow up in the 2025 Annual Report remain unidentified.

b) The characterization of material for ARD/ML potential is initially based on the geological model, which is developed using all available drilling, geological, and geochemical data. While this approach provides the best estimate available during mine planning, the spacing of the data used to develop the model may not capture localized variability in material characteristics. Higher-resolution ARD/ML characterization is achieved during blast hole drilling and sampling, which provides more detailed information immediately prior to mining. As a result, discrepancies may occasionally be identified between the model predictions and the material characteristics observed at the blast hole scale. Post-construction monitoring and sampling are conducted to confirm material performance and identify any need for adaptive management or remediation measures. The post construction monitoring will be added to the next version of the ARD/ML Testing and Sampling Plan.

CIRNAC-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.

Agnico Eagle Answer

Agnico Eagle thanks CIRNAC for their comments and refers CIRNAC to the response provided on August 3, 2026, to Comment CIRNAC-5 submitted through the NIRB review of the 2025 Annual Report.

On June 17, 2026, amendments to the Metal and Diamond Mining Effluent Regulations (MDMER) were published, including revisions to the *Acartia tonsa* acute lethality testing requirements for a period of 10 years. Under the revised Section 4.2 of the amended Regulation, if an effluent sample fails the *Acartia tonsa* test (>50% die in 100% effluent), it does not affect the mine's authority to deposit under Section 4 of the Regulation, provided no other acute lethality test indicates acute lethality. Agnico Eagle will continue to conduct *Acartia tonsa* testing and report results to ECCC, as required. This amendment will enable Agnico Eagle to initiate marine discharge of saline water as planned in accordance with the Water Management Plan.

CIRNAC-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.

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.

Agnico Eagle Answer

The MEL-2 monitoring station, as defined in the 2BE-MEL2434 Water Licence, tracks water for drilling and associated uses obtained from Meliadine, Pump, A8 Lakes and small lakes and ponds proximal to the drilling targets. In 2024 and 2025 and as noted in Section 3.1 of the Annual Report, freshwater under MEL-2 monitoring station was obtained from Lake A8 or small lakes and ponds proximal to the drilling targets.

In 2025, Meliadine conducted an extensive exploration program, with numerous drill rigs operating across the tundra to support both the discovery of new mineral resources and the expansion of existing deposits.

As a result, water use at this monitoring station was higher than in the previous year. Variations in water withdrawal volumes, both monthly and annually, are expected and are largely influenced by exploration activity levels and the proximity of available water sources to drilling locations versus to the mine site.

Water use under Water Licences 2AM-MEL1631 and 2BE-MEL2434 is closely monitored and, as noted by CIRNAC, remains well below the total authorized volume.

CIRNAC-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.

Agnico Eagle Answer

The evaluation of storage of water in mined-out pits was provided through the 2025 Modification process, has been reviewed by Parties, and was approved by the NWB.

As outlined in the September 24, 2025 Response to Comments, the intent of the 2025 Modification application was to seek consolidated approval for the use of mined-out pits TIRI02, WES02, WES03, and PUMP02 for the storage of both contact water and saline groundwater. Comprehensive assessments, such as a thermal, hydrogeological, and a water balance and water quality model, were completed for these pits and the results were included in the management plans submitted with the 2025 Modification application.

CIRNAC-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 staring in 2027 via the waterline. Especially in the event that the waterline is not being used for discharge of stored saline water.

Agnico Eagle Answer

In accordance with the Adaptive Management Plan for Water Management, when the waterline becomes operational, water will be discharged to Meliadine Lake only if there is insufficient capacity in the waterline system and stored surface contact water volumes are outside of normal operating levels set in place in consideration of D-CP1 design. Per the Water Licence requirements, discharge of effluent to Meliadine Lake will be minimized to the degree possible and will not exceed 2,600,000 m^3 per year. Discharge of surface contact water via the waterline is anticipated to commence in 2027 (please refer to responses provided to CIRNAC-1 and CIRNAC-2).

CIRNAC-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 m^3 (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 year end 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 m^3 is shown as equal to 1,0790,000 t; and b) waste rock total of 764,000 m^3 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 m^3 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 year end 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.

Agnico Eagle Answer

a) Agnico Eagle confirms the numbers in Table 3.2 of the Ore Storage Management Plan are correct. In 2025, 658,472 tonnes of ore was mined from TIRI01, 146,736 tonnes from PUMP01 and 23,280 tonnes from PUMP02.

b) In 2025, 267,469 tonnes of waste rock were placed on the TSF as progressive closure cover, as presented in the Mine Waste Management Plan, Table 3-1 (approximately 142,270 m^3). Since 2019, approximately 764,000 m^3 of waste rock has been placed on the TSF as progressive cover material.

Approximately 2,098,000 tonnes of tailings were placed in the TSF in 2025 (or approximately 1,272,000 m^3). CIRNAC is correct the TSF remaining design capacity at the end of 2025 should have read 1,079,000 tonnes (or approximately 654,000 m^3) in the Annual Report Section 4.4.1.

c) The design for the TSF expansion (with increased tailings capacity) was submitted to the NWB on April 15, 2026 and approved on June 23, 2026. The expanded design will be incorporated within the 2026 Annual Report. Consistent with this approach, detailed design reports for any future TSF expansions will be submitted to the NWB for review and approval a minimum of 60 days prior to implementation.

d) Agnico Eagle confirms the numbers in Table 10 of the Annual Report and Table 4.4 of the Ore Storage Management Plan (Appendix 28-06) are correct.

Table 10 of the Annual Report, as described in its title and in the text of the Annual Report above the Table, presents ore and waste rock stockpiles (tonnes) excluding major locations. Ore numbers in this table are an estimate of ore stockpiled (tonnes) on Ore Pad 1 (OP1) every month. The monthly cumulative stockpiles of waste rock and ore vary (and can go down) according to production and construction needs. At the end of December 2025, there were 3,203 tonnes of ore stockpiled on OP1. As mentioned below Table 10, as-built and expected waste rock and ore stockpiled at major locations on site (WRSF1, WRSF3 and WRSF6 for the waste rock, and OP2 for the ore) are provided in the MWMP and OSMP, respectively.

Table 4.4 of the Ore Storage Management Plan (Appendix 28-06) presents ore stockpiles (tonnes) at Ore Pad 2 (OP2). At the end of 2025, there were 460,000 tonnes of ore at OP2.

e) The reported values are correct. The discrepancy is due to a typographical error in the text, which was inadvertently carried over from the previous annual report.

f) Agnico Eagle believes the spills information provided in Section 6 (Environmental Incident Management) and Appendices 15 and 16 is sufficiently detailed and complete, and meets the reporting requirements of the Water Licences 2AM-MEL1631 and 2BE-MEL2434.

For non-reportable events, as these incidents are classified as *non-reportable* spills, Agnico Eagle is of the view that the summary table in Appendix 16 already provides information beyond the reporting requirements.

As for how Agnico Eagle uses this information, Agnico Eagle refers CIRNAC to Section 6 of the Annual Report. Lessons learned from previous years are applied to take corrective actions and proactive measures. Toolboxes are completed with all departments to discuss the most common occurrences of spills, and to gain insights on how to mitigate them. Further information is provided in the Annual Report.

g) Agnico Eagle acknowledges CIRNAC's comment and agrees that calculated TDS concentrations should be reported in section 7.3.1.10 of the Annual Report. Agnico Eagle would also like to note that the reported TDS and calculated TDS concentrations remained well below the applicable Water Licence criteria; therefore, the use of the appropriate Appendix 19 values would not alter the compliance status or conclusions presented in the Annual Report.

h) Agnico Eagle acknowledges CIRNAC's comment and will account for it in future Annual Reports.