



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

Your file - Votre référence
(Licence No. 2AM-MEL1631)
Our file - Notre référence
GCDOCS# 141636142

November 27, 2025

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 Licence Amendment and Construction Application for Meliadine Gold Project Request for Approval to Construct Access Road Within 31m of the High Water Mark of Meliadine Lake to Discharge Point, Type A Water Licence No. 2AM-MEL1631

Dear Richard,

Thank you for the November 3, 2025 invitation to review the referenced licence amendment and construction application, submitted by Agnico Eagle Mines Limited, 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*. CIRNAC does not support this application. 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 me at (613) 390-1682 or Cassandra.bach@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Cassandra Bach, B.Sc.,
Free Agent, Water Resources Coordinator

Canada 



Technical Review Memorandum

November 27, 2025:

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

From: Cassandra Bach – Free Agent, Water Resources Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Licence Amendment and Construction Application for Meliadine Gold Project Request for Approval to Construct Access Road Within 31m of the High Water Mark of Meliadine Lake to Discharge Point, Type A Water Licence No. 2AM-MEL1631

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

Agnico Eagle Mines Limited operates Meliadine Gold Mine which is located roughly 25 km north of Rankin Inlet and 80 km southwest of Chesterfield Inlet in the Kivalliq Region of Nunavut. The mine extracts gold by using open-pit and underground mining operations. The mine operates under project certificate 006, issued by the Nunavut Impact Review Board, and type A water licence 2AM-MEL1631, issued by the Nunavut Water Board.

On November 3, 2025, Agnico Eagle submitted a request to amend the licence to allow construction of an access road within 31 metres of the ordinary High-Water Mark (HWM) of Meliadine Lake. The road is intended to facilitate retrieval and future water discharge activities of a floating diffuser used during lake dewatering activities. Approximately 1000 tonnes of clean, non-acid generating waste rock from Tiriganiaq Open Pit 1 will be used for construction.

CIRNAC does not support this application and 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	Compliance with Licence Condition D.15
R-01A	Installation and Future Use of Diffuser for Lake Dewatering
R-01B	Sediment Control and Road Surface Runoff
R-01C	Spill Preparedness and Emergency Response
R-01D	Confirmation of Road Width Specifications
R-01E	Geochemical Suitability of Waste Rock
R-02	Amendment to the Water Licence
R-03	Removal Condition D.15 from Water Licence

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
251103 2AM-MEL1631 Request for Approval to Construct Access Road Within 31m of the High-Water Mark of Meliadine Lake to Discharge Point.pdf	Agnico Eagle Mines Limited, NWB File No. 2AM-MEL1631, November 3, 2025
251104 Request for Approval to Construct Access Road Within 31m of the High-Water Mark of Meliadine Lake to Discharge Point for water licence.pdf	Richard Dwyer, November 4, 2025
241025 2AM-MEL1631 Amended Licence-OASE Final.pdf	Nunavut Water Board, Issued September 9, 2024



C. RESULTS OF REVIEW

1. Compliance with Condition D.15

Comment:

The proposed road construction involves placement of material within 31 metres of the High-Water Mark, which is prohibited under Part D, Item 15 of the water licence which states:

The Licensee shall designate an area for the deposition of excavated and stockpiled materials, with respect to access roads, laydown area, pad construction or other earthworks, at a distance of at least thirty-one (31) metres from the ordinary High-Water Mark, in order to prevent the deposition of debris or sediment into or onto any Water body.

The concern is that the application sent to the Nunavut Water Board is not a formal request to amend the licence. Any change to this condition requires a formal licence amendment under Sections 55-61 of the Nunavut Waters and Nunavut Surface Rights Tribunal Act.

Recommendation:

(R-01) CIRNAC does not support this request for approval.

Any change to this condition requires a formal licence amendment under Sections 55-61 of the Nunavut Waters and Nunavut Surface Rights Tribunal Act.

1A. Installation and Future Use of Diffuser for Lake Dewatering

Comment:

The diffuser was installed in early 2025 without an access road. CIRNAC is concerned that the rationale for constructing a road now is unclear, given successful installation without one, and that the proposed road would contravene Part D, Item 15 of the water licence.

Recommendation:

(R-01A) CIRNAC recommends that the applicant provide details on the method used for diffuser installation and justification for why an access road is now required for retrieval. The clarification is necessary to assess whether the proposed road is essential or avoidable.

1B. Sediment Control and Road Surface Runoff



Comment:

Building a road within the prohibited 31 metres of the High-Water Mark increases risks of sediment transport and untreated road surface runoff entering the lake including but not limited to hydrocarbons, dust suppressants, and fine particulates.

Recommendation:

(R-01B) CIRNAC recommends the applicant provide:

- Detailed sediment and erosion control measures.
- Runoff diversion and treatment strategies.
- Monitoring plans to verify effectiveness and compliance.

1C. Spill Preparedness and Emergency Response

Comment:

Heavy equipment operating near a water body raises concerns about potential spills and contaminant release.

Recommendation:

(R-01C) CIRNAC recommends updating the Spill Contingency Plan (Part H, Item 1 of water licence) to include site specific to emergency preparedness measures for this work.

1D. Confirmation of Road Width Specifications

Comment:

The request for approval in the second paragraph states:

Small access road with an approximately 6-metre-wide footprint is proposed to the water's edge at Meliadine Lake.

While Figure 1 shows the road as being 15 metres wide, creating inconsistency.

Recommendation:

(R-01D) CIRNAC recommends that the applicant provide clarity about the actual width of the proposed road to ensure consistency across all documents.

1E. Geochemical Suitability of Waste Rock

Comment:



The request for approval indicates use of 1000 tonnes of clean, non-acid generating waste rock. Part D, Item 7 requires material be confirmed as non-acid generating and non-metal leaching.

Recommendation:

(R-01E) CIRNAC recommends submission of geochemical test results demonstrating compliance with the Mine Waste Management Plan and licence requirements.

2. Amendment to the Water Licence

Comment:

The request for approval is unclear whether it represents an application to amend water licence 2AM-MEL1631. CIRNAC requires clarity on whether the proponent is seeking a licence amendment or simply requesting approval for works under existing conditions.

Recommendation:

(R-02) CIRNAC recommends the applicant explicitly confirm whether this submission is intended as a formal amendment application. If it is not, CIRNAC advises that any substantive change to an undertaking, such as constructing a road within the 31-metre buffer, requires an amendment under Sections 55–61 of the Nunavut Waters and Nunavut Surface Rights Tribunal Act and Nunavut water Regulations (SOR/2013-69). CIRNAC cannot support approval outside of the established amendment process.

3. Removal of Condition D.15 from Water Licence

Comment:

The request suggests works that contravene Part D, Item 15 of the licence. CIRNAC requires clarity on whether the proponent intends to remove or modify this condition. There is no mechanism under the Act or NWB process to approve such works through an administrative request.

Recommendation:

(R-03) CIRNAC recommends the proponent confirm whether they are seeking to remove or alter condition D15. If so, this must be addressed through a formal amendment application, allowing the NWB to conduct a full technical review, public notice, and hearing as required under the Act and the Nunavut Land Claims Agreement. CIRNAC cannot support approval outside of the established amendment process.