AGNICO EAGLE
MELIADINE

September 18, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119 Gjoa Haven
Nunavut NU X0B 1J0

RE: *2AM-MEL1631 Design Report Waste Rock Storage Facility 3 Raise (WRSF 3)*

Dear Mr. Dwyer,

Agnico Eagle Mines Limited (Agnico Eagle) thanks the Nunavut Water Board (NWB) for the opportunity to address comments received for Meliadine Mine Waste Rock Storage Facility 3 (WRSF3) Raise Design Report.

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

260902 2AM-MEL1631 WRSF3 Raise Design Report CIRNA Comments-IMLE

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

With my best regards,

AGNICO EAGLE

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Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

CIRNAC-1: Encapsulating overburden

Comment

The design approach described in Section 5.2 of the Design report is: "waste rock and overburden materials will be co-disposed within the facility, with the overburden encapsulated within the central portion of the facility." The issued for construction drawings in appendix E, stability analysis figures in appendix D, and thermal analysis figures in appendix C all show a minimum thickness of 5 m of waste rock covering overburden.

The different appendices of the Design Report do not use the same assumptions regarding the volume and timing of overburden placement, raising questions on the capacity to cover overburden with waste rock. Table 1 in appendix C, "Preliminary Waste Rock and Overburden Placement Plan for WRSF3", states that from Summer 2029 until the end of mine waste placement in Summer 2031, only waste rock will be placed on the benches. This would allow any overburden placed in the centre of the facility prior to Summer 2029 to be encapsulated in waste rock. However, Table 1 in appendix B (Design Basis Memo) "Summary of Overburden and Waste Rock at WRSF3" lists that during the final year, 2031, both 3.26 M-m3 of waste rock and 1.11 M-m3 of overburden will be placed in WRSF3.

Overburden has different geotechnical properties than waste rock and could be more susceptible to erosion and dust generation, making it important to ensure it is encapsulated as planned.

Recommendations

(R-01) CIRNAC recommends that Agnico Eagle:

a. Clarify why there is a discrepancy in the type of material in to be placed in WRSF3 in 2031 between appendices B and C; and

b. Confirm the waste rock to be placed in 2031 will be sufficient to create a 5-m thick cover of all overburden placed the same year.

Agnico Eagle Answer

The mine plan shown in Appendix C is a previous version. The corrected waste rock and overburden placement plan used in the thermal modelling is presented in Table 1 below. The mine plan is updated regularly based on onsite and economic conditions. The difference between the actual placement schedule in operation and assumed placement schedule in the thermal modelling is not expected to have impact on the long-term performance of WRSF3.

The design identifies areas designated for waste rock placement and areas designated for either waste rock or overburden placement. Overburden will only be placed within areas explicitly identified for its placement. Waste rock is the only material specified for the top lift and side slopes of the facility; therefore, only waste rock will be placed in these areas. Based on the design storage curve of WRSF3 and mine waste production quantities, Agnico Eagle confirmed that there will be sufficient waste rock to maintain the minimum 5.0 m cover on top of the last overburden bench placed in 2031.

Table 1: Preliminary Waste Rock and Overburden Placement Plan for WRSF3

Waste Type	Bench Elevation (m)	Approximate Period of Mine Waste Placement
Overburden	67	January to March 2022
Waste rock	67	January to May 2022
Overburden	72	April to July 2022
Waste rock	72	June to December 2022
Overburden	77	December 2022 to March 2023
Waste rock	77	Summer 2023
Waste rock	82	Summer 2024
Waste rock	87	Winter 2025
Waste rock	92	Summer 2026
Overburden	97	December 2026 to April 2027
Waste rock	97	Summer 2027
Overburden	102/107	December 2027
Waste rock	107	Summer 2029
Waste rock	107	Summer 2030
Overburden	112/117	Winter 2031
Waste rock	112/117/122	Summer/Fall 2031

CIRNAC-2: MITIGATION MEASURES FOR LONG-TERM STABILITY

Comment

Ice-rich silt and sand layers are found beneath the footprints of both the WRSF3 and the tailings storage facility (TSF). These layers can lead to long-term creep deformation and creep deformation analyses for the TSF were reported on in the TSF Design Update Report. Section 5.5.1 of the WRSF3 Report states: “the results of the creep deformation analyses completed for the TSF are considered to provide a conservative upper-bound reference for evaluating potential long-term creep deformation at WRSF3.”

The TSF Report included proposed mitigation measures "to address the potential for longterm deformation associated with the ice-rich SILT layer in the TSF foundation." No similar measures were found in the WRSF3 Report despite the TSF model's use as a reference for WRSF3.

Recommendation

(R-02) CIRNAC recommends that Agnico Eagle explain why mitigation measures to prevent long-term creep deformation are not proposed for WRSF3, and if necessary include such measures in their plans.

Agnico Eagle Answer

The rationales for why no mitigation measures proposed for WRSF3 are described in Section 5.5 of the Design Report: "the potential long-term creep deformation at WRSF3 is expected to remain within the adopted deformation acceptance criterion of approximately 3% of the maximum facility height. Even under the conservative estimate of up to approximately 1.5 m of horizontal displacement, WRSF3 would be expected to accommodate this magnitude of deformation without compromising global structural stability or overall functionality." Therefore, no mitigation measures were included within the design, nor are they required.

CIRNAC-3: CLIMATE SCENARIOS FOR THERMAL MODELLING

Comment

The Design Basis in appendix B states "Thermal analyses will be carried out to estimate permafrost temperatures in the foundation under the designed long-term climate change scenarios". The analyses were performed using the CMIP6 SSP2-4.5 climate change dataset developed by Okane, as described in the Thermal Analysis Memo of appendix C.

Uncertainty in predicting future climate is most effectively addressed by using an ensemble of results from several climate models and including results based on several emissions scenarios (Government of Canada, 2026). A clear record of the consideration of multiple scenarios for infrastructure design decisions would provide project evaluators with the infrastructure design's sensitivity to climate change.

Recommendation

(R-03) CIRNAC recommends that in future thermal analyses, Agnico Eagle use climate model predictions from several plausible emission scenarios to better describe effects of climate change on proposed infrastructure.

Agnico Eagle Answer

Based on historical Rankin Inlet data, the CMIP6 SSP2-4.5 climate change scenario used for the WRSF3 design is representative of the current climate change trend. Moreover, the long-term performance of WRSF3 does not rely on the permafrost and is not sensitive to climate change. A fully thawed case was assessed during the design and meets the performance criteria.

Agnico Eagle will consider incorporating multiple climate change scenarios into the design of future infrastructure where long-term performance may be affected by climate change.