



September 5, 2025

Meliadine Distribution List

RE: Licence No: 2AM-MEL1631-Meliadine Gold Project; Agnico Eagle Mines Limited; Notice of Modification; Clarifications Received from Nunavut Impact Review Board and Nunavut Planning Commission and NWB Guidance Regarding Next Steps

On June 27, 2025 and July 10, 2025, the Nunavut Water Board (NWB or Board) received a Notice of Modification and associated information (the Notice) from Agnico Eagle Mines Limited (Agnico Eagle or Licensee) as required under Part G of type A Water Licence No: 2AM-MEL1631 (Licence) indicating that Agnico Eagle plans to conduct the following three activities as modifications of the Licence:

- Development of a portal in Pump Open Pit 2 (PUMP02) to extend access to deposits within permafrost;
- Associated temporary storage of Pump Underground Waste Rock; and
- Use of mined-out pits to store saline or contact water.

After receiving comments on the Notice from interested parties in mid-August, on August 20, 2025 the NWB sought clarification from the Nunavut Impact Review Board (NIRB) and Nunavut Planning Commission (NPC) in relation to a preliminary question raised by both the Kivalliq Inuit Association (KIA) and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Specifically, the NWB requested guidance from the NIRB regarding whether the proposed modifications in the Notice were within the scope of the NIRB's previous assessments of the Meliadine Gold Project and terms and conditions of the existing NIRB Project Certificate No. 006, and confirmation from NPC as to whether or not the modification project proposal requires referral to NIRB for impact assessment before the NWB considers the proposed modifications.

On September 2, 2025, the NWB received the following guidance from the NIRB:

1. *As noted by NPC, the proposed activities do not increase the footprint of the Project. Further, the activities proposed are not novel for the site in that underground mining and saline water storage were previously assessed by the NIRB and these activities are already in progress at the site.*

2. *As also noted by NPC, while the Project Certificate lists Tiriganiaq as the only deposit that was specifically planned to use underground mining at the time the project proposal was originally submitted to the NIRB and provided the basis for the NIRB's 2014 assessment, both the Final Environmental Impact Assessment (FEIS) reviewed by the NIRB and the NIRB Final Hearing Report Project identified the possibility of underground mining for the other deposits...*
3. *Saline water storage is already taking place in constructed ponds on site. As the NIRB has indicated in relation to the Meliadine site and also the Meadowbank site, using exhausted open pits for saline water storage rather than other types of uses is not generally considered sufficient to change the Board's assessment of potential impacts associated with the operation and reclamation of a mining project and trigger a Project Certificate reconsideration.*

Given the above, the NIRB has concluded that undertaking the proposed modification activities does not, on its face, appear to require changes to the existing Terms and Conditions for this project.¹

On September 4, 2025, the NWB received confirmation from NPC² that its conformity determination of June 20, 2025 remains unchanged and consequently the proposed activities in the Notice are exempt from requiring further assessment by the NIRB before being processed by the NWB.

Based on this guidance the NWB can now proceed to the next steps in the NWB's technical review of the proposed modifications in the Notice. As requested in the NWB's August 20, 2025 correspondence, on September 2, 2025 the KIA provided their technical review comments on the Notice. Consequently, technical comments about the Notice have now been received from:

- The Kivalliq Inuit Association (KIA)
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
- Environment and Climate Change Canada (ECCC)
- Fisheries and Oceans Canada (DFO)

¹ Email from K. Morrison, NIRB to K. Kharatyan, NWB Re: 2AM-MEL1631 Meliadine Gold Mine Project; Agnico Eagle Mines Limited; Notice of Modification Comment Summaries and NWB Guidance Regarding Next Steps, September 2, 2025.

² Email from S. Amuno, NPC to K. Kharatyan, NWB Re: 2AM-MEL1631 Meliadine Gold Mine Project; Agnico Eagle Mines Limited; Notice of Modification Comment Summaries and NWB Guidance Regarding Next Steps, September 4, 2025.

The comment submissions filed to date in relation to the Notice are available from the NWB's public registry at the following link:

<https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MEL1631%20Agnico/3%20TECH/G%20MODIFICATIONS/2025/Shallow%20Pump%20Underground%20Development/>

Next Steps in the NWB's Process

The next steps outlined below are based on the following assumptions:

- Agnico Eagle will not be seeking an amendment to the terms and conditions of NIRB Project Certificate No. 006 for the proposed activities (see for example the NIRB's query in relation to Term and Condition #25 specifically);
- By way of this modification, the Licensee is not seeking to amend any terms and conditions in the Licence;
- By way of this modification, the Licensee is not seeking a change from the requirement in Part F, Item 10 of the Licence, which prescribes: "*Saline Groundwater shall be managed separately from surface contact water and not directed to the contact water management system*".

If these assumptions are inaccurate, the NWB asks Agnico Eagle to advise the NWB as soon as possible. The NWB may review and update the following procedural guidance and timelines as needed to address any changes in circumstances.

However, based on the NWB's current understanding of the Notice and reflecting the comments received to date, the Board proposes the following next steps and tentative timelines:

- On or before **Thursday, September 25, 2025** Agnico Eagle provides their responses to the comments received in relation to the Notice; and
- On or before **Thursday, October 9, 2025** interested parties provide their confirmation as to whether or not they are satisfied with Agnico Eagle's responses to their comments.

Following the Board's receipt and review of Agnico Eagle's responses to comments and the confirmations from interested parties, if the NWB determines it is necessary, the Board proposes to host a short teleconference meeting to discuss the Notice and the outstanding and resolved issues on **October 24 or 27, 2025**. When providing the written submissions listed above, the Board encourages parties to identify if they have a preferred date for a potential teleconference meeting.

If you have any questions regarding the filings associated with the Notice, please contact Richard Dwyer, Licensing Manager, at richard.dwyer@nwb-oen.ca or by phone at (867) 360-6338 (ext.

27). For any other inquiries, please contact the undersigned, Karén Kharatyan, Director of Technical Services, by e-mail to karen.kharatyan@nwb-oen.ca.

Sincerely,

Karén Kharatyan
Director, Technical Services
NUNAVUT WATER BOARD