



Fisheries and Oceans
Canada

Pêches et Océans
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Programme de protection du poisson et de son habitat
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July 23, 2025

Your file *Votre référence*
2AM-MEA1530, 2AM-WTP1830

Our file *Notre référence*
16-HCAA-00370, 20-HCAA-00275

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: 2AM-MEA1530 & 2AM-WTP1830– Agnico Eagle – Meadowbank Gold Mine and Whale Tail Pit Projects (Meadowbank Complex) – 2024 Annual Monitoring Report

Dear Richard Dwyer,

The Fish and Fish Habitat Protection Program of Fisheries and Oceans Canada (DFO) received your request for comments on April 17, 2025. DFO has reviewed the above 2024 Annual Monitoring Report in regards to its mandate, i.e. the management, protection and conservation of fish and their habitats. The Nunavut Water Board (NWB) invited parties to submit comments.

Specifically, DFO has review the following:

- 2024 Annual Report
- Appendix 7 - Meadowbank and Whale Tail 2024 Geotechnical Inspection Report
- Appendix 10 - Meadowbank and Whale Tail 2024 Annual Geotechnical Recommendation Implementation Plan
- Appendix 11 - Meadowbank 2024 Geomechanical Inspection Implementation Plan
- Appendix 12 - Whale Tail 2024 Geomechanical Inspection Implementation Plan
- Appendix 13 - Meadowbank Water Management Plan Version 14
- Appendix 14 - Whale Tail Water Management Plan Version 14
- Appendix 16 - Meadowbank Predicted Water Quantity and Quality (2024)
- Appendix 22 - Meadowbank and Whale Tail Spill Contingency Plan Version 21
- Appendix 23 - Meadowbank 2024 GN Spill Reports
- Appendix 24 - Whale Tail 2024 GN Spill Reports

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- Appendix 25 - Meadowbank OPEP and OPPP Version 18
- Appendix 26 - Meadowbank and Whale Tail 2024 CREMP Report
- Appendix 27 - Whale Tail 2024 Mercury Monitoring Program Report
- Appendix 31 - Whale Tail 2024 Report on the Implementation of Measures to Avoid and Mitigate Serious Harm
- Appendix 32 - Meadowbank and Whale Tail 2024 Marine Mammal and Seabird Report
- Appendix 33 - Meadowbank and Whale Tail Blast Monitoring Program Version 10
- Appendix 34 - Meadowbank and Whale Tail 2024 Blast Monitoring Report
- Appendix 37 - Whale Tail 2024 Fish Habitat Offsets Monitoring Report
- Appendix 39 - Meadowbank and Whale Tail 2024 Wildlife Monitoring Summary Report
- Appendix 59 – Shipping Management Plan Version 5

DFO provides the following comments for the NWB's consideration.

DFO is generally agreeable with Agnico Eagle Mine's reporting and has the following comments or concerns to provide at this time.

Comment Number:	DFO-1
Subject/Topic:	Correction of DFO File Numbers
References:	Main Report Section 11.5.7
Comment:	Gap/Issue: The annual report reports DFO occurrence file number incorrectly (#4-HCAA-02467 and #4-HCAA-02468).
Conclusion/Request:	Proponent to correct DFO file numbers to 24-HCAA-02467 and 24-HCAA-02468 respectively.

Comment Number:	DFO-2
Subject/Topic:	Culverts: Barriers to Fish Passage and Sedimentation
References:	Appendix 7: 2024 Geotechnical Inspection Report
Comment:	Gap/Issue: AEM notes potential barriers to fish passage and sedimentation (buried culverts, signs of erosion, and granular material from the road). However, gravel deposition from the road has not been removed from culverts that were identified in the 2023 annual report and remain buried.

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Conclusion/Request:	Proponent to remove gravel that is burying culverts posing a risk to fish passage, potential sedimentation into fish bearing waters, and impeding drainage. While some of the culverts buried or blocked by gravel have not been identified as fish-bearing, DFO recommends removal of gravel at all culverts to ensure protection of fish habitat. This work can be done following DFO's Culvert Maintenance Code of Practice .
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Comment Number:	DFO-3
Subject/Topic:	Marine Mammal Monitoring Program
References:	Appendix 32: Meadowbank and Whale Tail 2024 Marine Mammal and Seabird Report
Comment:	Gap/Issue : Current Marine Mammal Monitoring survey efforts (1 survey per day, lasting 1.5-2 hours) are not sufficient for effective marine mammal monitoring
Conclusion/Request:	DFO requests increasing monitoring effort to 2 surveys per day minimum, with a break in between to alleviate monitor eye fatigue and/or consider using technology to scan for marine mammals.

Comment Number:	DFO-4
Subject/Topic:	Marine Mammal Monitoring Program: Vessels travelling in sensitive habitat
References:	Appendix 32: Meadowbank and Whale Tail 2024 Marine Mammal and Seabird Report
Comment:	Gap/Issue: Vessels are required to avoid sensitive wildlife habitat and travel south of Coats Island when it is safe to do so. However, vessels transited north of Coats Island on 3 occasions.
Conclusion/Request:	Proponent to ensure compliance with setbacks from sensitive habitat. Additionally, DFO recommends when compliance cannot occur due to safety, a

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	<p>marine mammal observer monitor for marine mammals during all transits north of Coats Island and when crossing setback distances, in addition to their regular monitoring schedule.</p> <p>DFO to work with the proponent to update their marine mammal monitoring protocol and include these additional monitoring efforts.</p>
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Comment Number:	DFO-5
Subject/Topic:	Aquatic Invasive Species
References:	Shipping Management Plan (Version 5);
Comment:	<p>Gap/Issue: Current monitoring plans do not include a monitoring program for aquatic invasive species.</p> <p>There is a risk of introducing aquatic invasive species through hull contamination from ships coming from Quebec. The Shipping Management Plan requires the shipping companies contracted to supply the mine through the annual sea-lift operations to comply with the Ballast Water Regulations, which reduces the risk of invasive species being introduced as a result of shipping activities, but does not eliminate this risk so that monitoring for the occurrence of aquatic invasive species is required to confirm this. There is a greater risk of invasive species establishment due to Meadowbank shipping activities since vessels are travelling from freshwater (Quebec) to freshwater (Baker Lake).</p>
Conclusion/Request:	<p>Proponent to consider a Non-Indigenous Species/Aquatic Invasive Species Monitoring Program around zones of higher risk (Baker Lake).</p> <p>Proponent to provide specific monitoring and mitigation measures that are being conducted, including but not limited to any ballast water treatment, monitoring for aquatic invasive species (eDNA, hull,</p>

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	and ballast water sampling), any hull clean-up and maintenance protocols, etc.
Comment Number:	DFO-6
Subject/Topic:	Underwater Noise
References:	Shipping Management Plan (Version 5)
Comment:	<p>Gap/Issue: Underwater noise from shipping vessels has the potential to elicit disturbance effects on marine mammals by reducing their ability to travel, communicate, and find food.</p> <p>During the 2024 shipping season, 16 vessel trips served the project. We currently do not know what noise level and characteristic is produced by those shipping vessels and the potential impact on marine mammals.</p> <p>The FEIS predicted the residual environmental effect of a change in marine mammal behaviour as a result of Project vessel noise was considered to be low in magnitude, however the likelihood of behavioural disturbance from Project-related vessel noise was considered likely. However there is no monitoring of noise levels to help understand and mitigate these effects.</p>
Conclusion/Request:	<p>Proponent to provide any data or modeling work to date by the Proponent or the shipping company. DFO to work with the Proponent to monitor and model their noise footprint using expert support. This model should aim at evaluating the impact of shipping noise on marine mammals present on the shipping route. A Shipping Management Plan should be updated according to the model.</p>

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Comment Number:	DFO-7
Subject/Topic:	Updated DFO Regions & Contacts for Emergency Response
References:	Appendix 23: Meadowbank OPEP and OPPP Version 18
Comment:	Gap/Issue: The Department of Fisheries and Oceans separated the Central and Arctic Region in April of 2024.
Conclusion/Request:	<p>Proponent to updated the information in Appendix 23 with new DFO Arctic Region information and contact list for environmental emergency response.</p> <ul style="list-style-type: none"> DFO Arctic Environmental Incident Coordinator dfo.arcenvincident-incidentenvarc.mpo@dfo-mpo.gc.ca <p>E.g., Replacing Figure 1-1 with updated DFO regions. Example figure shown below.</p>  <p>DFO to work with the Proponent to ensure all necessary changes and updates are made, and provide a contact list for marine environmental emergencies.</p>

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

Sincerely,

Jennifer Loughery

Jennifer Loughery

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Senior Biologist
Fish and Fish Habitat Protection Program
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CC:
Holly Simpson, Fisheries and Oceans Canada
José Audet-Lecouffe, Fisheries and Oceans Canada