



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-MEA1530, 2AM-WTP1830
Our file - Notre référence
GCDOCS# 143851560

July 7, 2026

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
Annual Report for Meadowbank Complex, Type A Water Licences No. 2AM-
MEA1530 and 2AM-WTP1830**

Dear Richard Dwyer,

Thank you for the 7 April 2026 invitation to review the annual reports, submitted by Agnico Eagle Mines (AEM), for Type A Water Licences No. 2AM-MEA1530, 2AM-WTP1830.

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*. 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 William Quere at william.quere@rcaanc-cirnac.gc.ca or (873) 452-1981 Or Andrew Keim at (867) 975-4550 or Andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

William Quere, BSc
Regional Coordinator

Canada 



Technical Review Memorandum

Date: 7 July 2026

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

From: William Quere – Regional Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Annual Report for Meadowbank Complex, Type A Water Licences No. 2AM-MEA1530 and 2AM-WTP1830

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Meadowbank Complex is located approximately 110 kilometres by road north of Baker Lake in the Kivalliq District of Nunavut, Canada. The complex consists of the Meadowbank mine and mill, and the Whale Tail (Amaruq) satellite deposit, which is located 50 kilometres northwest of the Meadowbank mine.

The Meadowbank Gold Mine Project is governed by the current Type A Water Licence No. 2AM-MEA1530 and Nunavut Impact Review Board (NIRB) Project Certificate 004.

The project was first licensed by the Nunavut Water Board (NWB) in 2008 and the processing plant achieved commercial production in March 2010. The original Water Licence was subsequently renewed by the Board in August 2015 and was amended in July 2018 to reflect changes to the Project to allow for additional tailings deposition and associated ore processing at the Meadowbank mine site from AEM's mining operations at the Whale Tail Pit site. In March 2019, the Water Licence was amended for the third time to allow for tailings disposal in the mined-out Goose and Portage pits. In May 2020, the fourth amendment was granted to allow the activities for the Whale Tail Mine expansion, i.e., the term of the Water Licence was extended by four years, now expiring in March 2030. At present, the project components included in the scope of the Water License consist of the Meadowbank mine site and the Vault mine site, a Marshalling Facility in Baker Lake, and a 110-kilometre All-Weather Access Road (AWAR) between Baker Lake and the Meadowbank mine site. There are also water retention dikes constructed from mined waste rock to allow for the mining of ore beneath shallow dewatered lakes and a tailings storage facility (Second Portage Lake's northwest dewatered arm), where tailings have been deposited sub-aerially as slurry and water from the ponds reclaimed during operation. No mining at Meadowbank occurred in 2025 since the mineral reserves were exhausted in 2019. Whale Tail ore continued to be processed at Meadowbank mill in 2025. As approved by the Water License, in-pit tailings disposal began in Goose Pit on July 5th, 2019, and in Portage Pit E on August 20th, 2020.



Multiple amendments have been issued under NIRB Project Certificate 004 including: Amendment 001 (20 November 2009) to reflect modifications associated with the all-weather access road and Proponent Project Name Change; Amendment 002 (12 August 2016) to reflect development of Vault Pit Expansion Project, remove Term and Condition #48, and update Terms and Conditions #49 and 53; and Amendment 003 (21 December 2019) to reflect modifications of in-pit tailings disposal, new commentary to Terms and Conditions #9, 19, and 20 and addition of Term and Condition #87.

In 2025, no amendment to Water Licenses or Project Certificates were required.

In 2016, AEM proposed to develop the Whale Tail Project to continue mine operations and milling at the Meadowbank Mine and extend the Meadowbank Mine to include development of resources from Whale Tail. The Whale Tail mining operation uses the existing infrastructure at the Meadowbank mine (mining equipment, mill, tailings, camp, and airstrip). Additional infrastructure has been built at the Whale Tail site (truck shop/warehouse, fuel storage and an additional camp facility). The deposit was mined as an open pit in 2019, and commercial production was achieved on September 30th, 2019. Whale Tail ore is transported using long haul off-road trucks to the mill at the Meadowbank site for processing.

In 2018, AEM proposed to increase gold production from the original Whale Tail Project by expanding mining activities at the Whale Tail mine site as proposed in the Expansion Proposal. The Expansion Proposal proposed further develop the Whale Tail Pit open mine in addition to the development of the IVR open pit and Underground operations. The Whale Tail expansion started in October 2018 with an application to Nunavut Planning Commission (NPC). The permitting process to amend the Whale Tail Project Certificate and Type A Water License to include the Whale Tail expansion was completed in early 2020. In a decision issued on October 18th, 2019, the NIRB concluded that if conducted in accordance with the NIRB's recommendations, this proposed amendment to the Whale Tail mine could proceed to the Type A Water License amendment phase with the NWB. The Minister of Northern Affairs approved the amended Project Certificate Report from the NIRB on January 20th, 2020, completing the NIRB process. Project Certificate 008 amendment No. 1 was received on February 19th, 2020. The NWB Water License amendment process was completed on May 12th, 2020, and the Water License Amendment 2AM-WTP1830 was issued.

In 2024, AEM proposed a Modification to the Whale Tail Mine (referred to as the 2024 Modification) operating to mid-2028 under the License approval to 2030. The project proposal was submitted to the NPC on April 4th, 2024. On April 19th, 2024, the NPC determined that the proposed Modification was exempt from screening by the NIRB, as the activities did not change the general scope of the original or previously amended activities. On May 6th, 2024, AEM submitted a 60-day notice to the NWB for a Modification to Type A Water License 2AM-WTP1830. The NWB provided its approval of the 2024 Modification on August 6th, 2024, indicating the modification proposed is consistent with the scope of activities considered under Type A Water License 2AM-WTP1830.



In 2025, no amendment to Water Licenses or Project Certificates were required.

All ore at the Meadowbank Complex is now sourced from the Whale Tail mine. Mining at Whale Tail is by open pit and underground methods. The ore is extracted conventionally using drilling and blasting, then hauled by a long-haul off-road truck fleet to the mill at the Meadowbank facilities for processing. Commercial production was achieved on September 30th, 2019, at the Whale Tail pit. The IVR pit began pre-stripping activities in the third quarter of 2020 and achieved commercial production on December 31st, 2020. Commercial production from underground activities was achieved on August 1st, 2022. Under current mine plans, the Whale Tail mine is expected to be in production through 2028.

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	Annual Report Reporting Requirements
R-02	Polychlorinated Biphenyl (PCB) Detection Limit for Waste Oil Monitoring
R-03	GN Spill Reporting Forms
R-04	Incomplete Geotechnical Implementation Plan
R-05	Whale Tail Water Quality Trends
R-06	Whale Tail Productivity Indicators
R-07	Mill Seepage and Groundwater Management
R-08	Adaptive Management Response to CREMP Trigger Exceedances
R-09	Waste Rock Geochemical Characterization and ARD/ML Monitoring
R-10	Spill Trends and Preventative Measures

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
Meadowbank Complex - 2025 Annual Report	AEM, 31 March 2026
Appendix 1: Meadowbank Update on Implementation of Commitments	AEM, March 2026
Appendix 2: Whale Tail Update on Implementation of Commitments	AEM, March 2026
Appendix 3: NIRB and NWB 2024 Annual Report Commitments	AEM, March 2026
Appendix 4: Meadowbank and Whale Tail Executive Summary Translation	AEM, March 2026
Appendix 5: 2025 Annual Report NIRB 11EN010	AEM, March 2026
Appendix 6: Baker Lake 2025 Bathymetric Survey	AEM, March 2026
Appendix 7: Meadowbank and Whale Tail 2025 Annual Geotechnical Inspection Report	BGC, February 2026
Appendix 8: Meadowbank 2025 Annual Open Pit Geomechanical Inspection Report	KP, January 2026
Appendix 9: Whale Tail 2025 Annual Open Pit Geomechanical Inspection Report	KP, March 2026
Appendix 10: Meadowbank and Whale Tail 2025 Annual Geotechnical Recommendation Implementation Plan	AEM, March 2026



Document Title	Author, File No., Rev., Date
Appendix 11: Meadowbank 2025 Geomechanical Inspection Implementation Plan	AEM, March 2026
Appendix 12: Whale Tail 2025 Geomechanical Inspection Implementation Plan	AEM, March 2026
Appendix 13: Meadowbank Water Management Plan Version 15	AEM, March 2026
Appendix 14: Whale Tail Water Management Plan Version 15	AEM, March 2026
Appendix 15: Meadowbank and Whale Tail IRB Report No 33	MBK IRB, 30 January 2026
Appendix 16: Meadowbank Collection Pond 23 Construction Summary Report	AEM, March 2026
Appendix 17: Meadowbank Mine Waste Rock and Tailings Management Plan Version 16	AEM, February 2026
Appendix 18: Whale Tail Waste Rock Management Plan Version 15	AEM, March 2026
Appendix 19: Meadowbank 2025 Thermal Monitoring Report	AEM, February 2026
Appendix 20: Whale Tail 2025 Thermal Monitoring Report	AEM, February 2025
Appendix 21: Meadowbank and Whale Tail 2025 Waste Transport Manifest	AEM, March 2025
Appendix 22: Meadowbank and Whale Tail Spill Contingency Plan Version 24	AEM, March 2026
Appendix 23: Whale Tail Mine Incinerator and Composter Waste Management Plan Version 3	AEM, April 2025
Appendix 24: Whale Tail Operational ARD-ML Sampling and Testing Plan Version 8	AEM, December 2025
Appendix 25: Meadowbank OPEP and OPPP Version 19	AEM, March 2026
Appendix 26: Meadowbank and Whale Tail 2025 CREMP Report	AZIMUTH, March 2026
Appendix 27: Whale Tail 2025 Mercury Monitoring Program Report	AZIMUTH, March 2026
Appendix 28: Meadowbank and Whale Tail 2025 Aquatic Effects Management Program Report	AEM, March 2026
Appendix 29: Whale Tail 2025 Report on the Implementation of Measures to Avoid and Mitigate Serious Harm	AEM, February 2026
Appendix 30: Meadowbank and Whale Tail 2025 Marine Mammal and Seabird Report	ERM, March 2026
Appendix 31: Meadowbank and Whale Tail 2025 Blast Monitoring Report	AEM, March 2026
Appendix 32: Meadowbank 2025 Groundwater	ERM, March 2026



Document Title	Author, File No., Rev., Date
Monitoring Report	
Appendix 33: Whale Tail 2025 Groundwater Management Monitoring Report	WSP, March 2026
Appendix 34: Whale Tail 2025 Fish Habitat Offsets Monitoring Report	AEM, March 2026
Appendix 35: Meadowbank 2025 Habitat Compensation Monitoring Report	AEM, March 2026
Appendix 36: Meadowbank and Whale Tail 2025 Wildlife Monitoring Summary Report	WSP, March 2026
Appendix 37: Meadowbank and Whale Tail 2025 Noise Monitoring Report	AEM, March 2026
Appendix 38: Meadowbank and Whale Tail 2025 Air Quality and Dustfall Monitoring Report	AEM, March 2026
Appendix 39: Meadowbank and Whale Tail 2025 Water Quality Monitoring Results§	AEM, March 2026
Appendix 40: Meadowbank and Whale Tail Quality Assurance-Quality Control Plan Version 11	AEM, March 2026
Appendix 41: Meadowbank and Whale Tail 2025 Quality Assurance-Quality Control Results	AEM, March 2026
Appendix 42: Meadowbank and Whale Tail Emergency Response Plan Version 21	AEM, February 2026
Appendix 43: Agnico Eagle Kivalliq Projects 2025 Socio-Economic Monitoring Program Report	AGU-ERM, March 2026
Appendix 44: Meadowbank and Whale Tail 2025 Public Consultations	AEM, March 2026
Appendix 45: Meadowbank Training Management System and Learning Management System Reports	AEM, March 2026
Appendix 46: 2024 Kivalliq Projects Socio-Economic and Environment Highlights	AEM, March 2026
Appendix 47: Agnico Eagle Kivalliq Elders Advisory Committee 2025 Summary Report	AEM January 2025
Appendix 48: Meadowbank 2025 Conceptual Socio-Economic Closure Plan Update	AEM, March 2026
Appendix 49: Whale Tail Operation and Maintenance Manual Arsenic Water Treatment Plant Version 3	AEM, March 2026
CIRNAC Letter to Richard Dwyer (NWB) Re: CIRNAC's Review of the 2024 Annual Report for Meadowbank and Whale Tail Gold Mine Projects, Type A Water Licence Nos. 2AM-MEA1530 and	CIRNAC, 23 July 2025



Document Title	Author, File No., Rev., Date
2AM-WTP1830	
Agnico Eagle Letter to Richard Dwyer (NWB) Re: Agnico Eagle's Response to Meadowbank (2AM-MEA1530) and Whale Tail (2AM-WTP1830) 2024 Annual Report Comments	AEM, 29 August 2025
CIRNAC Letter to Richard Dwyer (NWB) Re: CIRNAC's Reply to Agnico Eagle's Response to the 2024 Annual Report Review Comments for Meadowbank and Whale Tail Gold Mine Projects, Type A Water Licence Nos. 2AM-MEA1530 and 2AM-WTP1830	CIRNAC, 6 October 2025



C. RESULTS OF REVIEW

1. Annual Report Reporting Requirements

Comment:

Item 5, Schedule B: General Conditions, of the Meadowbank Water Licence 2AM-MEA1530 requires the Annual Report to include a summary of reporting results for the Water Balance Water Quality model and any calibrations. However, Section 4.4.3.1 Predicted Vs Measured Water Quality of the 2025 Annual Report refers to the reader to Appendix 13 “for the 2025 Meadowbank Water Balance Water Quality Model Report in which the predicted water quantity and quality within the pits is compared to the measured water quantity and quality.” As such, no summary discussion/results are provided in Section 4.4.3.1.

Item 7-f of the Meadowbank Water Licence 2AM-MEA1530 requires the Annual Report to include geochemical data associated with tailings solids, tailings supernatant, cyanide leach residue, and bleed from the cyanide destruction process including an interpretation of the data. Section 5.1.1 Geochemical Monitoring for Meadowbank of the 2025 Annual Report only provides and discusses geochemical data associated with tailings solids. Section 5.1.1.1 states that tailings porewater quality data, which have been collected for at least three years in 2022, 2023 and 2024, will be included in the closure studies to be presented in the Closure and Reclamation Plan.

The concern is that by not providing the aforementioned data and associated discussion in the Annual Report, Agnico Eagle is not in compliance with the reporting requirements for the Annual Report.

Appendix 13 – Meadowbank Water Management Plan is a large report with several supporting appendices. Including a summary discussion of the relevant information from the appendix would be helpful in reviewing the information. With respect to the tailings porewater data, it would be helpful to understand these water quality trends and the behaviour of the tailings prior to the preparation of the Closure and Reclamation Plan.

Recommendation:

(R-01) CIRNAC recommends that Agnico Eagle:

- a) In future Annual Reports, include a summary discussion of the information and results presented in the Meadowbank Water Management Plan supporting appendix within the main body of the Annual Report (Section 4.4.3.1); and
- b) Provide all tailings porewater monitoring data collected to date to CIRNAC for review.



2. Polychlorinated Biphenyl (PCB) Detection Limit for Waste Oil Monitoring

Comment:

Section 6.2.1.1 of the Annual Report states that in 2025, one sample of waste oil was collected per month and analyzed for flashpoint, total halogen, metals (cadmium, chromium, lead) and polychlorinated biphenyls (PCBs). The waste oil monitoring results for 2025 are presented in Table 6-6. Agnico Eagle states that all PCB parameters have met the GN Environmental Guideline of 2 mg/kg however, all PCB results are reported as being < 5 mg/kg, i.e., below a detection limit of 5 mg/kg.

The concern is that, Given that the detection limit is higher than the maximum allowable concentration, the analysis does not confirm compliance with the GN Environmental Guideline.

Recommendation:

(R-02) CIRNAC recommends that moving forward, Agnico Eagle ensures that the analytical detection limit for PCB in waste oil is lower than the GN Environmental Guideline value of 2 mg/kg to demonstrate compliance.

3. GN Spill Reporting Forms

Comment:

Section 7.1 of the Annual Report provides a discussion of reportable and non-reportable spills for both the Meadowbank and Whale Tail sites. Table 7-2 (Meadowbank) and 7-4 (Whale Tail) summarize spills reported to the GN 24hr Spill Hotline and include both the cause of the spill and clean-up action taken. For additional information on any particular spill, Agnico Eagle provides a link to the GN Spill Reporting Website where the GN Spill Reporting Forms can be accessed.

The concern is that this link takes the reader to the general Environment and Climate Change website where the reader is expected to navigate the site to find information on a particular spill.

Recommendation:

(R-03) CIRNAC recommends that in future Annual Reports, Agnico Eagle include the GN Spill Reporting forms as an appendix to the report, similar to what was done in previous Annual Reports, to make the information more readily accessible to the reader or provide specific links to each Reportable Spill.



4. Incomplete Geotechnical Implementation Plan

Comment:

Normal practice for this site and others operated by Agnico Eagle has been to provide a Geotechnical Recommendation Implementation Plan that addresses all the concerns raised by the Third-Party Geotechnical Engineer in their annual inspection of the site.

Unlike prior years on this file, the existing Recommendation Implementation Plan (Appendix 10), as provided in the 2025 Annual Geotechnical Inspection Report (Appendix 7), only addresses the closed or completed items and is silent on any ongoing or future proposed works required to address the inspector's concerns.

The concern is that only 14 of the 42 recommendations/comments have been addressed at the time of reporting with no direction or comment provided by Agnico Eagle on the remaining 28 items.

Recommendation:

(R-04) CIRNAC recommends that Agnico Eagle provide an updated Recommendation Implementation Plan that includes a response to all recommendations and comments provided by BGC in Table 13-1 of the Annual Geotechnical Inspection Report.

5. Whale Tail Water Quality Trends

Comment:

The 2025 Core Receiving Environmental Monitoring Program (CREMP) identified statistically significant increases in several water quality parameters within portions of the Whale Tail receiving environment, including conductivity, hardness, major ions, nutrients, lithium, and related indicators. While the observed concentrations generally remain below applicable environmental quality guidelines and the AEMP concludes that effects remain within the range predicted during the environmental assessment, the trends appear to be becoming more pronounced at several monitoring stations. The Annual Report indicates that these changes are attributable to mine-related influences and remain low in magnitude.

The concern however is that the report provides limited discussion regarding the long-term trajectory of these trends, the extent to which they are stabilizing versus continuing to increase, and the implications for future adaptive management decisions.

**Recommendation:**

(R-05) CIRNAC recommends that Agnico Eagle:

- a) Summarize temporal trends for the principal water quality parameters exhibiting statistically significant increases within the Whale Tail receiving environment;
- b) Discuss whether the observed trends are stabilizing, increasing, or declining relative to previous monitoring periods;
- c) Describe any adaptive management measures currently being considered to address these trends should they continue to increase in future years.

6. Whale Tail Productivity Indicators**Comment:**

The 2025 CREMP identified elevated nutrient concentrations and increased phytoplankton biomass at several monitoring locations within the Whale Tail receiving environment. Although the observed increases were not statistically significant and did not exceed adaptive management thresholds, they may represent early indications of increased aquatic productivity associated with mine-related nutrient inputs.

There is a concern where the Annual Report concludes that no adverse ecological effects have been identified; however, additional information regarding the relationship between observed nutrient trends and productivity indicators would assist reviewers in evaluating the significance of these observations.

Recommendation:

(R-06) CIRNAC recommends that Agnico Eagle:

- a) Summarize observed relationships between nutrient concentrations and phytoplankton biomass trends within the Whale Tail receiving environment;
- b) Discuss whether the observed productivity indicators remain within the range anticipated during the environmental assessment.



7. Mill Seepage and Groundwater Management

Comment:

The Annual Report indicates that seepage associated with the Assay Lab Road area continues to be monitored and managed through existing water management infrastructure. The issue has been the subject of previous investigations, monitoring programs, corrective measures, and engineering evaluations. Agnico Eagle has reported that seepage remains contained within the site contact water management system and that corrective measures have been implemented. There is a concern that, Given the long duration of this issue and the continued need for monitoring and management, additional information is needed to assist reviewers in evaluating the effectiveness of the corrective measures and the status of the long-term solution.

Recommendation:

(R-07) CIRNAC recommends that Agnico Eagle:

- a) Provide an update on implementation of the long-term corrective measures developed for the Assay Lab Road seepage issue;
- b) Summarize monitoring results collected since completion of the most recent corrective actions.

8. Adaptive Management Response to CREMP Trigger Exceedances

Comment:

Several water quality parameters within the Whale Tail receiving environment exceeded CREMP trigger levels or exhibited statistically significant increases relative to baseline conditions during 2025.

Although adaptive management thresholds were not exceeded and no adverse ecological effects were identified, there is a concern where the observed results demonstrate that measurable mine-related effects continue to occur within portions of the receiving environment.

Additional information would assist reviewers in understanding how these monitoring results are being incorporated into adaptive management decision-making.

**Recommendation:**

(R-08) CIRNAC recommends that Agnico Eagle:

- a) Identify any management actions, investigations, or monitoring modifications considered as a result of the observed trigger exceedances;
- b) Discuss whether any refinements to existing trigger levels, action thresholds, or monitoring programs are being considered.

9. Waste Rock Geochemical Characterization and ARD/ML Monitoring**Comment:**

The Annual Report indicates that geochemical characterization and ARD/ML monitoring programs continue to be implemented for waste rock and construction materials. Ongoing characterization is important for confirming assumptions regarding material behaviour and supporting adaptive management of mine wastes.

While no significant concerns were identified during the reporting period, additional information would assist reviewers in evaluating whether recent monitoring results remain consistent with previous predictions.

Recommendation:

(R-09) CIRNAC recommends that Agnico Eagle:

- a) Summarize significant geochemical characterization results obtained during 2025;
- b) Identify any notable changes in ARD/ML classification or material management practices arising from recent monitoring results;
- c) Confirm whether observed geochemical performance remains consistent with previous predictions and management assumptions.

10. Spill Trends and Preventative Measures**Comment:**

The Annual Report documents reportable spill events that occurred during the reporting period and the corrective actions implemented by Agnico Eagle. Although the reported events do not appear to have resulted in significant adverse environmental effects, review of spill trends can provide useful information regarding recurring operational vulnerabilities and opportunities for preventative action.

**Recommendation:**

(R-10) CIRNAC recommends that Agnico Eagle:

- a) Identify any recurring spill causes or operational themes that have emerged from recent incident investigations over the last five years;
- b) Describe measures that are being implemented in 2026 to reduce the likelihood of future spill events and improve environmental protection performance.