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Prairie & Northern Region  
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ECCC File: 6100 000 008/021  
NIRB File: 2AM-WTP1830



January 16, 2026

via email at: [richard.dwyer@nwb-oen.ca](mailto:richard.dwyer@nwb-oen.ca)

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

Dear Richard Dwyer:

**RE: 2AM-WTP1830 – Agnico Eagle Mines Ltd. – Meadowbank Complex – Operational  
ARD-ML Sampling and Testing Plan V.8.0 – Whale Tail Mine**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) by Agnico Eagle Mines Ltd. (“the Proponent”) regarding the above-mentioned Operational ARD-ML Sampling and Testing Plan.

ECCC provides expert information and knowledge to project assessments on subjects within the department’s mandate, including climate change, air quality, water quality, biodiversity, environmental emergencies preparedness and responses. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent’s characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comment is provided:

**1. Field sampling frequency in IVR Phase 2 Pit**

Reference:

Agnico Eagle Meadowbank Complex Operational ARD-ML Sampling and Testing Plan – Whale Tail Mine. December 2025, Version 8.0.

- Section 3.1 Field Sampling
- Table 3.0 Recommended Sampling Frequency by Rock Type



Comment:

In Section 3.1, the Proponent reports the following conclusions and recommendations based on information gathered during five years of mining the IVR Pit:

- *“IVR Phase 2 Pit has been returning carbon and sulfur assay values translating in CaNPR values (as defined in Section 3.2 of this document), above the threshold value of 2 for the past four benches and typically ranging between 5 and 30 for the north-west part (North Basalt) and ranging from 20 to 300 for the south part (Central Sediment and Komatiite South) of the study area.*
- *Conversely, the arsenic content returned systematic values well above 75 ppm for the same set of samples and even systematically in the high hundreds of ppm’s (usually ranging between 100-1000 ppm).*
- *The IVR Extension demonstrates few occurrences of minable NPAG/NML packets. For IVR Phase 2 the NPAG/NML packets are insignificant in terms of volume to deem suitable for mining separately (see Figure 1.2).*

*Based on the above observations, although non-acid generating per the CaNPR calculation, the material from IVR Phase 2 Pit must be systematically classified as PAG/ML due to its high content of arsenic and associated leachability potential. For this reason, the Geology Superintendent recommends to:*

- *Decrease the sampling frequency of 1/4 ratio for Carbon/Sulfur and Arsenic in IVR Phase 2 to 1/16 ratio. This would be applied to all remaining mining benches in the IVR Phase 2 Pit.*
- *Maintain the 1/4 sampling ratio for the remainder of the IVR Pit, including the IVR Extension.”*

Given the above recommendations, and the proposal to “...reduce further the sampling frequency in IVR PH 2 to every 16<sup>th</sup> hole.” (Table 3.0), it is not clear whether the rock mined in IVR Phase 2, which was classified as potentially acid generating/metal leaching (PAG/ML) due to high arsenic content, will continue to be classified as PAG/ML regardless of the results of future sampling conducted at reduced frequency.

ECCC Recommendation:

ECCC recommends the Proponent clarify whether the mineable rocks in the IVR Phase 2 will continue to be classified as PAG/ML regardless of the results of future sampling conducted at reduced frequency.

If you need more information, please contact Erik Allen at [Erik.Allen@ec.gc.ca](mailto:Erik.Allen@ec.gc.ca).

Sincerely,

Erik Allen  
Senior Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)