



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# 135298619

July 3, 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: Agnico Eagle Mines' 15 May 2026 Response to CIRNAC Comments on Agnico Eagle Mines' December 2025 ICRP for the Meadowbank Complex

Dear Richard Dwyer,

This letter is provided in response to Agnico Eagle Mines' (AEM) 15 May 2026 response to Comments received from Kivalliq Inuit Association (KiviA), Crown Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC) and Department of Fisheries and Oceans (DFO) regarding the updated Meadowbank Complex Interim Closure and Reclamation Plan (ICRP) submission of 15 December 2025.

Notwithstanding the shortcoming of technical information requested to be included in the closure plan, CIRNAC first and foremost, wishes to express that CIRNAC has a fundamental objection to AEM's request that parts of the update to the ICRP be considered FINAL. From CIRNAC's perspective this is unacceptable given that there is no formal technical and public review process for an ICRP.

Our general and response specific comments are provided in the following pages and attachments

1. **Background**

As stated by AEM, significant efforts have been expended by all parties with respect to the breadth of closure and reclamation considerations for the Meadowbank Complex in 2025. In addition, CIRNAC would also note that our efforts, started much before the timeline noted by AEM. Since 2020 CIRNAC has spent significant time identifying potential closure concerns through the multiple years of the Annual Report review process for the Meadowbank Complex which has informed us on the needs of the Meadowbank closure program and was used in the current IR and TRC process as discussed below.



It is noted that the pre-submission step started in November 2024 with AEM's informal sharing of its combined Meadowbank and Whale Tail Closure Plans in a consolidated Meadowbank Complex Closure Reclamation Plan (CRP) Version 0, November 2024. At that time, AEM stated that it anticipated that a Final Closure and Reclamation Plan (FCRP) would be developed as the Meadowbank Complex approaches closure in 2028, with the FCRP being submitted at least 12 months prior to the end of planned mining. By updating the Meadowbank Complex CRP and combining the standalone Meadowbank Mine and Whale Tail Mine ICRPs into one unified document, AEM indicated that the overall goal of the CRP was to provide flexibility regarding progressive reclamation, closure approaches, and closure scheduling. AEM also indicated that the revised CRP aimed to achieve a 'near-final' state, so that the development of the FCRP is efficient, and results in a clear path forward for the implementation of closure designs and reclamation activities. AEM further stated that the CRP was meant to update the reclamation liability, thus providing an accurate estimate of current financial liabilities associated with closure.

AEM noted that the objective of the submission was to put forward a preferred approach for final closure of the Meadowbank Complex. AEM distributed the draft plan to CIRNAC and KivIA to solicit input and make adjustments as appropriate to the document prior to formally submitting the proposed Final Closure Plan to the Nunavut Water Board (NWB).

2. **Review Process**

Given AEM's stated intent that this was a precursor to the formal submission of AEM's Final Closure Plan, it was incumbent on all parties to ensure that all closure aspects were fully described along with technical documentation for the record that supported new or revised closure approaches and designs submitted for the first time by AEM

In keeping with the nature and extent of the proposed changes, CIRNAC identified a series of preliminary Information Requests (6 February 2025) to which AEM provided initial responses (21 February 2025) and agreement on the need to hold a series of workshops to address these concerns.

In particular, the proposed changes related to tailings storage facility (TSF) closure concepts and water management were subsequently discussed during a May 2025 workshop in Ottawa, and as part of a site visit in August 2025.

CIRNAC's initial scan of the November 2024 Meadowbank Consolidated CRP resulted in the development of numerous Information Requests that were provided to, and discussed with, AEM in January 2025, with respect to the following primary topics:

1. TMA cover (changed from 2+m thermal cover to 1m saturation cover);
2. In-pit tailings closure/cover (no longer being considered);
3. Waste rock storage facility (WRSF) covers;
4. Water management / treatment (change in treatment, discharge to Vault Pit);
5. Water quality and load balance modelling;



6. Other mine components (e.g., buildings, landfills, roads);
7. Post-closure monitoring;
8. Long-term care and maintenance;
9. Managing uncertainty and risk;
10. Security estimate (lack of unit rate updates, etc.) and approach for security release; and
11. Relinquishment procedures.

CIRNAC suggested that these topics could most effectively be discussed in person and, to that end, it was agreed that a series of technical meetings/workshops would be held to advance these concerns. The chronology of Information Requests and Technical Meetings/Workshops was as follows.

- a) 25 January 2025 AEM presented/discussed the 2024 draft CRP update with CIRNAC/KIA in Vancouver
- b) 7 February 2025 CIRNAC provided AEM with Informal IRs on two major topics of concern; a) TSF cover design, and b) Water Management
- c) 21 February 2025, AEM provided Responses to CIRNAC and KiA IRs
- d) 3 April 2025, AEM provided updates to initial responses
- e) 8 & 9 May 2025, Ottawa Technical Meeting/Workshop focused on TSF and Water Management aspects of the draft ICRP update AEM agreed to provide:
 - o meeting minutes,
 - o copies of all presentations,
 - o responses to CIRNAC and KIA additional information meeting requests as provided to AEM at the meeting (request provided in Attachment 2)
 - o [The above information was to be provided by the beginning of July 2025, well in advance of a 2nd Technical Meeting/Workshop tentatively scheduled for mid to late August at the Meadowbank Complex]
- f) Note that contrary to the above commitment of item e), AEM did not provide any additional information before the August Technical Meeting/Workshop
- g) August Site Visit and Technical Meeting/Workshop
 - o 20 August 2025, Site visit to Meadowbank and Vault Mines
 - o 21 August 2025, Site visit to Whale Tail Mine



- o 22 August 2025, Technical Meeting/Workshop Presentations and Discussions re TSF cover design and ARD modelling and Water Management Considerations.

Note that, in the absence of any additional technical documentation being provided since the original submission of the November 2024 documents, the discussions remained at a high level and CIRNAC's technical concerns were not resolved.

3. **Additional Information Requests Based on Technical Reviews**

As noted above, based on an initial review of the draft closure plan update distributed in November 2024, CIRNAC generated Informal Information Requests (IRs) which were provided to AEM on 7 February 2025. AEM initially responded on 21 February 2025 and subsequently provided updates to CIRNAC TSF-IRs 8,9 and 11 on 3 April 2025.

AEM did not provide any of the additional technical documentation requested by CIRNAC before the May 2025 workshop in Ottawa. While the TSF closure cover and water management topics were subsequently presented and discussed during the workshop, the technical documentation previously requested was still outstanding.

At the end of the May workshop, as requested by AEM, CIRNAC summarized and provided its request for additional information specific to the TSF closure concept. At that time, AEM committed to respond to this information request by July 2025. However, as of 22 August 2025, no additional information had been provided in response to CIRNAC's 9 May 2025 information requests.

AEM hosted site visit tours of the Meadowbank and Vault Sites on 20 August 2025 and of the Whale tail Site on 21 August 2025. The tours provided overviews of the mine tailings storage facilities, the waste rock storage facilities and the water management facilities. The tour was well organized and included knowledgeable staff who provided information regarding the existing site features and plans going forward. The tour also included the members of the Independent Review Board (IRB) who were on site for their annual site review.

On the morning of 22 August, Okane and AEM staff provided presentations on the TSF cover design and water management approach. During the course of the presentations and subsequent thereto, CIRNAC's topics of concern were reiterated, but no additional technical documentation was provided on any of CIRNAC's prior requests.

AEM had not provided the additional technical documentation in the 4 months since the May meetings and in some cases 7 months since the first information requests were submitted, despite CIRNAC submitting two rounds of comments and participating in three meetings/workshops (January in Vancouver, May in Ottawa and August at the Meadowbank complex).

4. **Additional Actions and Discussions**

On 10 October 2025, AEM provided a report titled "Evidence-Based Selection for Tailings Storage Facility Cover Configuration, Version A" and convened a related presentation.



Based on the 10 October 2025 discussions, it was CIRNAC's understanding that AEM would revise the draft Closure Plan to fully incorporate all new information that was provided throughout the review process in preparation for the eventual submission of a Final Closure Plan.

CIRNAC noted its appreciation of AEM's efforts in hosting the workshop meetings with CIRNAC and KivIA that allowed for discussion of concerns related to the TSF and with respect to water management at closure.

Importantly, CIRNAC was pleased that through these discussions AEM has decided to change its proposed TSF cover from a 1-m saturation cover to a 2-m saturation cover that is more in line with the original closure cover requirement of 2 m for thermal encapsulation.

We note that throughout the 2025 pre-review process, CIRNAC made it abundantly clear that the additional information discussed and requested during the workshops would need to be provided and included in the updated closure plan submitted for formal review to the NWB.

However, on 15 December 2025, AEM submitted an updated Interim Closure and Reclamation Plan (ICRP) that fell short on additional information expectations resulting in the Technical Review Comments (TRCs) provided to the NWB by CIRNAC on March 4th 2026.

Subsequently, on 15 May 2026, AEM provided a high-level response to CIRNAC's TRCs. After conducting a review of AEM's responses, CIRNAC concludes that the vast majority of the TRCs have not been addressed in a meaningful manner, as documented in Annex A.

5. **Fundamental Issue**

In addition to the shortcomings related to the lack of technical information that has been requested be included in the closure plan, CIRNAC first and foremost wishes to re-iterate its concerns and express that CIRNAC has a fundamental objection based on a lack of evidence and in compliance with the regulatory process to AEM's request that parts of the update to the ICRP be considered FINAL.

CIRNAC notes that there is nothing preventing AEM from carrying out progressive reclamation as they are presently doing, at their own cost, in the absence of a Final Closure Plan. CIRNAC is opposed to AEM's desire to have part of the December 2025 ICRP classified as Final.

From CIRNAC's perspective AEM's request is unacceptable given that no formal technical and public review process are required for an ICRP update, while development and Board approval of a FINAL Closure Plan requires that a formal Technical and Public review be carried out prior to the approval of the plan.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the response 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



Technical Review Memorandum

Date: 3 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 Agnico Eagle Mines response to the updated Interim Closure and Reclamation Plan (ICRP) for the Meadowbank Complex for Type A Water Licences 2AM-MEA1530 and 2AM-WTP1830

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Meadowbank Gold Mine is located approximately 110 kilometres by road north of Baker Lake in the Kivalliq region 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. Each site operates under a separate Type A Water Licence: 2AM-MEA1530 (Meadowbank) and 2AM-WTP1830 (Whale Tail).

The Nunavut Water Board (NWB, Board) first licensed the project in 2008, and the processing plant achieved commercial production in March 2010. The Project involved the construction, operation, maintenance, reclamation, closure and monitoring of an open pit gold mine and milling facility. The original 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 Agnico Eagle Mines (AEM) mining operations at the Whale Tail Pit site. No mining at Meadowbank mine occurred in recent years since the mineral reserves were exhausted in 2019.

In 2016, Agnico Eagle proposed to develop the Whale Tail Pit Project to continue mine operations and milling at the Meadowbank mine. Agnico Eagle initially requested that the Whale Tail Pit Project be regulated as an amendment to the Meadowbank Gold Mine Project. However, the Nunavut Impact Review Board (NIRB) determined that the proposed Whale Tail Pit Project proposal had not been assessed as part of the original Meadowbank Gold Mine Project and, due to its location outside of the original Meadowbank Gold Mine Project footprint, it would require a separate screening assessment. Upon completing the screening assessment, the NIRB determined that the Whale Tail Pit Project required further assessment, best facilitated through a full environmental review. The environmental review concluded on March 15, 2018, with Project Certificate No. 008 issuance.



Additional infrastructure to support the Whale Tail Pit Project was built at the Amaruq site (truck shop/warehouse, fuel storage and an additional camp facility), and the Amaruq satellite deposit was mined as an open pit with commercial production beginning in September 2019. Amaruq ore is transported using long-haul off-road type trucks to the mill at the Meadowbank site for processing. All tailings generated from Amaruq ore are also deposited at the Meadowbank site.

The Amaruq Phase 2 expansion started in October 2018 with an application to the Nunavut Planning Commission (NPC). Following public hearings on the proposed expansion in August 2019, the NIRB concluded that the proposed Whale Tail Pit Project amendment could proceed to the Type A Water License amendment phase with the Nunavut Water Board. The Minister of Northern Affairs approved the amended Project Certificate Report from the NIRB on January 20, 2020, completing the NIRB process. NIRB issued the Project Certificate 008 amendment No. 1 on February 19, 2020 to reflect significant modifications to the Whale Tail Pit Project as proposed in the Whale Tail Pit Expansion Project (i.e., revisions to Terms and Conditions #1, 27, 28, 30, 46 and 51; new Terms and Conditions #65 to 68).

As existing gold processing and accommodations infrastructure at the Meadowbank Gold Mine site are required to support mining operations at the Whale Tail Pit, NIRB identified existing terms and conditions in the amended Project Certificate No. 004 that will continue to apply to the Whale Tail Pit project infrastructure associated with the Meadowbank Gold Mine site, even after the closure and reclamation of the developed pits at the Meadowbank Gold Mine site.

In 2025, AEM submitted a combined Interim Closure and Reclamation Plan (ICRP) for the Meadowbank complex to include both Meadowbank mine and Whale Tail mine. The stated goal of combining the ICRP's is to "give Agnico Eagle flexibility in progressive reclamation, closure approaches, and closure scheduling". The new ICRP has included new information on closure activities and monitoring results. With the intent on entering closure in the coming years, AEM would like to update their reclamation liability. To this end, the ICRP includes a preferred final closure plan for the Meadowbank TSF.

CIRNAC provides the following comments and recommendations pertaining to the application package. 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	Closure sequencing versus potential life-of-mine extension
R-02	Treatment of the TSF closure appendix as “final” prior to a Final Closure and Reclamation Plan (FCRP)
R-03	Aggressive review timelines
R-04	Engagement claims and incorporation of feedback
R-05	Revegetation strategy
R-06	Tracking of changes from previously approved closure concepts
R-07	Change to the approved Tailings Storage Facility (TSF) design basis
R-08	TSF closure strategy is not ready to be treated as “final”
R-09	Risk of advancing TSF closure ahead of integrated site-wide closure planning
R-10	Closure objectives and criteria are not measurable
R-11	No TSF-specific post-closure Trigger Action Response Plan (TARP)
R-12	Geotechnical risks of thicker covers are not demonstrated
R-13	Referenced supporting studies are not provided
R-14	No structured post-closure failure modes assessment
R-15	Cold-regions cover performance
R-16	Rationale for strategy change
R-17	Alternatives analysis (Multiple Accounts Analysis (MAA)/options screening)
R-18	Meromixis feasibility and verification
R-19	Meromixis failure modes and contingency planning
R-20	Freshwater cap depth and aquatic life protection
R-21	Regulatory acceptability of “dirty water at depth”
R-22	Pipeline transfer risk and mitigation
R-23	Portage/Goose pit re-flooding assumptions (tailings stability and water quality)
R-24	Cost and liability transparency
R-25	Early Implementation of Unapproved Water Management Strategy
R-26	Potential Requirement for Nunavut Impact Review Board (NIRB) Environmental Assessment Review
R-27	Post-closure water quality criteria are not clearly defined or differentiated
R-28	Lack of a structured Trigger Action Response Plan (TARP) and reconnection decision framework
R-29	Waste Rock Storage Facility (WRSF) wet-up and dynamic equilibrium may not be demonstrated
R-30	Sensitivity and uncertainty analysis is insufficiently developed



R-31	Role of in-pit tailings as a water quality source term is unclear
R-32	Reconnection timing is highly sensitive to arsenic predictions
R-33	Modelling horizon does not fully capture late-time source term evolution
R-34	Long-term recontamination risk from in-pit tailings
R-35	Removal of committed rock cover over in-pit tailings
R-36	Tailings resuspension and physical disturbance under flooded conditions
R-37	Regulatory and closure consistency of changing the in-pit tailings end state
R-38	Status and suitability of partially treated reclaim water
R-39	Rationale for abandoning the approved treatment-and-discharge strategy
R-40	Demonstration of in-pit treatment performance
R-41	Status and readiness of the closure water treatment system
R-42	Consistency with the approved ICRP
R-43	Basis for differing Waste Rock Storage Facility (WRSF) cover thicknesses (Meadowbank vs. Whale Tail)
R-44	Active layer penetration through the thermal covers
R-45	Availability and adequacy of detailed thermal modelling reports
R-46	Progressive reclamation verification
R-47	Consideration of non-geochemical closure factors (e.g., wildlife interaction)
R-48	Viability of contingency measures for underperforming thermal covers on WRSFs
R-49	Inconsistent modelling horizons between source terms and water quality predictions
R-50	Underground disposal of equipment, demolition debris, and contaminated soils
R-51	Cyanide-impacted residues and demolition considerations
R-52	Disposal pathways and acceptance criteria for demolition waste
R-53	Confirmation of residual acid rock drainage/metal leaching (ARD/ML) and metals exposure across disturbed footprints
R-54	Criteria for identifying “metal contamination” and adequacy of non-potentially acid generating/non-metal leaching (NPAG/NML) cover material
R-55	Exposure scenario assumptions in the HHERA
R-56	Apparent absence of soil POPCs despite widespread mine disturbance
R-57	Chromium in sediments at Third Portage Lake
R-58	Interim nature of Closure and Post-Closure Compliance Monitoring Plan (CPCMP) and Adaptive Reduction Framework
R-59	Technical justification for any monitoring reductions
R-60	Linkages to current operational/Water Licence monitoring



R-61	Adaptive Reduction Framework Decision Rules
R-62	Seepage monitoring needs explicit trigger-response linkages
R-63	Workshop to advance the monitoring/reduction framework
R-64	Proposed Interim Closure and Reclamation Plan (ICRP) scope changes
R-65	Security release framework
R-66	Evidence requirements to support security reduction
R-67	Escalation, inflation, and timing of security updates

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
Interim Closure and Reclamation Plan for the Meadowbank Complex	Agnico Eagle, Version 1, December 2025
Appendix 1-A: Meadowbank Closure Consultation and Engagement Comments and Questions	AEM, April 2025
Appendix 2-A: Meadowbank and Whale Tail 2024 Geotechnical Inspection Report	AEM, February 2025
Appendix 5-A: Progressive Reclamation of Quarries	AEM, November 2024
Appendix 5-B: Progressive Reclamation Photographs	AEM, 2121, 2023, 2024
Appendix 6-A: Closure and Post-closure Monitoring Plan, V1	AEM, November 2025
Appendix 6-B: Reclamation Research	AEM, undated
Appendix 6-C: Closure Investigation Work Plan	AEM, October 2024
Appendix 6-D: Human Health and Ecologic Risk Assessment	WSP, October 2024
Appendix 6-E: Meadowbank Water Balance and Water Quality Model – Technical Report	Lorax, November 2024
Appendix 6-F: Technical Memorandum – Predictive Effects Assessment for Fish in the Pits at Meadowbank During Closure	Azmith, November 2024
Appendix 6-G: Acceptable/ Unacceptable Types of Waste for the Meadowbank Complex Landfill Including electronic (e-waste), tires and vehicles/machinery	AEM, October 2024
Appendix 6-H: Portage WRSF Cover Design and Thermal Monitoring	Okane, February 2023
Appendix 6-I: Whale Tail Adaptive Management Plan	AEM, July 2021
260515 2AM-MEA1530 and 2AM-WTP1830 ICRP AEM Response to Comments-IMLE (002)	AEM, May 2026



C. RESULTS OF REVIEW

1. Closure sequencing versus potential life-of-mine extension

Comment:

The Interim Closure and Reclamation Plan (ICRP) positions the Meadowbank Complex as approaching closure and characterizes the plan as “near-final,” while AEM has publicly indicated it is evaluating options to continue operations beyond 2028. In this context, it is unclear why certain closure components (specifically the Tailings Storage Facility, TSF) are being advanced toward finalization and construction in 2026, given that continued operations could materially affect closure sequencing, integration, and design assumptions.

Recommendation:

(R-01) CIRNAC recommends that AEM should clearly document the rationale for advancing TSF closure at this stage, including explicit scenarios for closure in 2028 versus continued operation beyond 2028, and to explain how each scenario affects site-wide closure integration, water management, and long-term risk.

Agnico Eagle Response:

As described in response to CIRNAC-02 and CIRNAC-08, the capacity of the North Cell/South Cell TSF has been reached and Agnico Eagle wishes to initiate the final closure cover design commencing in 2026.

Tailings deposition are occurring in the in-pit tailings facility.

CIRNAC Reply:

CIRNAC’s comment indicated that the final closure decision for the TSF should be made with full consideration of the potential extension of the mine life. AEM’s response does not address that aspect of the request.

2. Treatment of the TSF closure appendix as “final” prior to a Final Closure and Reclamation Plan (FCRP)

Comment:

The ICRP states that the TSF closure strategy should be considered final and approved in advance of the full FCRP to enable construction in 2026, despite AEM not being prepared to submit a site-wide FCRP at this time. Given the strong interdependencies between the TSF, water management, monitoring, and contingencies, advancing a single major component as “final” introduces risk that assumptions embedded in the TSF design may later be affected by site-wide closure decisions (and vice versa).

Recommendation:

(R-02) CIRNAC recommends that AEM should explicitly justify the appropriateness of treating the TSF closure strategy as final in advance of the full FCRP, including a clear



explanation of how interdependencies with other closure components will be managed and revisited if site-wide assumptions change.

Agnico Eagle Response:

The TSF closure strategy component of the ICRP must be treated as final because the TSF is planned for progressive reclamation – that is, Agnico Eagle does not intend to defer closure of the TSF until after production at Meadowbank is complete. Agnico Eagle intends to advance closure of the Meadowbank TSF in 2026 because it allows Agnico Eagle to:

- Actively reduce environmental liabilities at site for facilities that are no longer needed for production mining (which will reduce the amounts required for reclamation security and potential liabilities to the Crown and KivIA).
- Utilize equipment and workforce during operations (which also helps maintain employment levels).
- Closely monitor the performance of the cover during operations.
- Comply with the Type A Water Licence which requires that “The Licensee shall implement progressive reclamation, including progressive covering of the tailings and if practicable re-vegetation” (see Part J, Item 5). Additionally,
 - o The definition as per the Type A Water Licence of “Progressive Reclamation” aligns with the actions that Agnico Eagle is planning for the TSF: “means actions that can be taken during mining operations before permanent closure, to take advantage of cost and operating efficiencies by using the resources available from mine operations to reduce the overall reclamation cost incurred. It enhances environmental protection and shortens the timeframe for achieving the reclamation objectives and goals.”
 - o The definition of Interim Closure and Reclamation Plan as per the Type A Water Licence also references closure of facilities that are no longer needed during the operational mine life: “Interim Closure and Reclamation Plan means a conceptual detailed plan on the reclamation of mine components which will not be closed until the end of mining operations, and operational detail for components which are to be progressively reclaimed throughout the mine life”.
- Align with certain 2002 CIRNAC Mine Site Reclamation Policy for Nunavut statements regarding progressive reclamation, including:
 - o “Best management practices, including progressive reclamation, should be applied to advance environmental protection and reduce environmental risks.”
 - o “Mine closure and reclamation plans should be sufficiently flexible to allow adjustments as the life of the mine progresses, including the flexibility to adapt to new and improved technologies and methodologies, and allowing for progressive reclamation, while ensuring obligations under the plans are met.”
 - o “A plan should fully address the following: ... The progressive reclamation of the site during the life of the operation, to the extent feasible, given the mining and processing methods employed.”



- o “Ongoing reclamation throughout the life of the mine is preferable from both the environmental and financial liability perspectives.”
Synergies in workforce and equipment availabilities during operations make progressive closure of the TSF the preferred option, while delaying closure activities puts undue stress on the active closure period. There are no advantages that Agnico Eagle has identified to deferring closure of the TSF. It is not necessary to have final closure strategies in place for all Meadowbank mine facilities in order to close the TSF.

CIRNAC Reply:

The response justifies implementing progressive reclamation, which CIRNAC encourages. However, progressive reclamation regularly occurs without the closure strategy being classified as “final”. The covers on the waste rock storage facilities or transfer of reclaim water to the Vault Pit are both examples of progressive reclamation activities that have not been finalized. As a consequence, it is acknowledged that there remains a possibility that the closure approach may need to be augmented in the future when the ICRP transitions to being an FCRP. AEM has not provided adequate explanation of why the progressive reclamation of the tailings facility should be treated differently and classified as final.

3. Aggressive review timelines

Comment:

Appendix 6J suggests that review and approval of the ICRP, including the TSF closure design, should not exceed 60 days, citing prior engagement with reviewers. Given the number of substantive information gaps and unresolved technical issues identified across multiple components (as identified in this submission of review comments), this timeline is not consistent with the level of review required to support informed closure decisions.

Recommendation:

(R-03) CIRNAC recommends that AEM should remove any implied expectation of a fixed or accelerated approval timeline and to instead support a review process that is paced by the resolution of identified technical information gaps.

Agnico Eagle Response:

For clarity, Agnico Eagle is not requesting an accelerated timeline. As of May 15, 2026, Agnico Eagle has been consulting on this ICRP for 537 days.

Agnico Eagle first shared the ICRP draft with CIRNAC and KivIA on November 14, 2024, which has provided a lengthy timeline for sharing of information and raising of technical issues. Following the November 2024 submission, Agnico Eagle:

- met with CIRNAC and KivIA in January 2025
- addressed technical comments from CIRNAC and KivIA between February-April 2025



- hosted a in-person two-day meeting with CIRNAC and KivIA in May 2025
- hosted a three-day site visit at the Meadowbank Complex with CIRNAC and KivIA in August 2025
- met with CIRNAC in-person in October 2025
- had a virtual conference call with KivIA in October 2025

This pre-submission step went well beyond typical engagement.

While we do strive for agreement with reviewers where it is possible, given the lengthy ICRP pre-submission and formal NWB review process (537 days), it seems unlikely that a protracted back and forth further will increase the level of consensus.

Further delay of the finalization of the ICRP is not in the public's best interest as Agnico Eagle wishes to begin implementation of an approved ICRP as soon as possible. We are confident in the technical ability of the NWB and its staff to evaluate the evidence that Agnico Eagle has presented.

CIRNAC Reply:

Despite multiple requests from CIRNAC and others, AEM has not provided substantive responses to multiple requests for additional technical information related to the revised closure strategies. Consequently, and in the absence of additional technical information being provided, the majority of concerns previously identified by CIRNAC remain outstanding. It is also important to note that the majority of time that has elapsed since AEM submitted their initial documentation has been consumed by periods in which AEM was in control of the process. At all junctures CIRNAC has provided prompt and substantive feedback on the material that has been submitted by AEM.

4. Engagement claims and incorporation of feedback

Comment:

AEM states that extensive engagement has been undertaken with communities, Inuit organizations, and regulators in support of closure planning (as documented in Appendix 1A). However, the ICRP does not clearly demonstrate how that input influenced or changed the closure plan. Without this traceability, it is difficult to assess whether engagement outcomes have been meaningfully incorporated.

Recommendation:

(R-04) CIRNAC recommends that AEM should provide a summary table documenting engagement inputs, AEM responses, and specific changes made to the ICRP as a result of that input, including identification of any unresolved issues.



Agnico Eagle Response:

Agnico Eagle acknowledges CIRNAC's comments and can look for opportunities to improve the engagement summary log. However, Appendix 1-A does include details CIRNAC provides in its request, including:

- Engagement inputs
- Agnico Eagle responses
- Status of issues

As outlined in Section 1.5.3 of the ICRP, engagement past April 2025 has been ongoing and in addition, future engagement is slated for 2026. Consultation in 2025, past April 2025, will be summarized in the 2025 annual report. To avoid duplication of review, a copy has not been included in this response package.

Many questions and comments received are related to socio-economics (e.g., training, employment, etc.). As outlined in Section 1.5.3 of the ICRP, as required by NIRB Project Certificate No.008 Condition 51, Agnico Eagle was to develop a conceptual Socioeconomic Closure Plan for the Whale Tail Mine. The Socio-economic Closure Plan has been updated as part of the 2024 Annual Report and will continue to be updated on a yearly basis and reported through the NIRB annual report process.

Comments are considered in the ICRP, where appropriate, as again, many comments relate more to the Socio-economic Closure Plan. An example of incorporation to the ICRP includes Section 6.11.1 "When no longer required for closure or post-closure monitoring, the AWAR and Whale Tail Haul Road will be reclaimed, and the natural drainage and terrain will be restored as much as possible. Upon local interest and regulatory approval, the AWAR and Whale Tail Haul Road could be transferred to the local community.". The KEAC, Baker Lake HTO and Elders, and others questioned what will be done with the AWAR. There are discussions ongoing with this topic with Hamlet, Government, and others; therefore, is left high-level in the ICRP at this time.

CIRNAC Reply:

AEM has not provided a response to the request in either the 2025 annual report or elsewhere. There is no documentation of the concerns identified by CIRNAC. There are also many substantive technical concerns in CIRNAC's comments, very few of which have been adequately resolved.

5. Revegetation strategy

Comment:

The ICRP states that active revegetation will be omitted from reclamation prescriptions, citing feasibility considerations and historical preferences for natural recovery. While this may be appropriate in some contexts, the submission does not clearly demonstrate that



current Inuit leadership supports this approach for the Meadowbank Complex, nor does it define measurable expectations for natural recovery.

Recommendation:

(R-05) CIRNAC recommends that AEM should document current Inuit organization positions on the omission of active revegetation and to define clear, verifiable criteria for assessing the success of natural recovery post-closure.

Agnico Eagle Response:

Given limited salvageable topsoil and harsh Arctic conditions, Agnico Eagle's base case remains natural revegetation. As outlined in the ICRP, reclamation efforts will be designed to encourage natural succession of indigenous plant species.

To address NIRB Project Certificate No.008, Term and Condition 13 and 26, natural revegetation is already promoted and included in the Whale Tail ICRP (2019).

As per past Meadowbank Complex Annual Reports, additional assessments are being completed at the Meadowbank site for the monitoring of natural revegetation and to identify ways to promote natural revegetation during the closure activities. The details will be included in the Final Closure and Reclamation Plan.

CIRNAC Reply:

AEM's response does not relate to the request.

6. Tracking of changes from previously approved closure concepts

Comment:

The ICRP includes several material departures from closure concepts that were previously reviewed or approved, including the TSF closure approach and pit water management strategy. These changes are not consolidated in a single, authoritative tracking mechanism, which creates uncertainty around what has and has not been accepted for approval purposes.

Recommendation:

(R-06) CIRNAC recommends that AEM should include a comprehensive closure change log that identifies all departures from previously approved closure concepts, provides the rationale for each change, documents engagement undertaken, and identifies any regulatory implications. Any changes not included in this log should be treated as not yet approved.

Agnico Eagle Response:

The general purpose of the Meadowbank Complex ICRP is to update the previous 2019 ICRPs and combine them into one unified document, allowing Agnico Eagle flexibility in progressive reclamation, closure approaches, and closure scheduling. The unified plan



presents an updated description on the Meadowbank Complex (Section 2), Progressive Reclamation (Section 5), and a comprehensive update to Permanent Reclamation and Closure (Section 6) with details on the closure objectives and criteria.

Although CIRNAC requests a change log, the following is provided to support comments made by CIRNAC. A management plan, as per Conditions of the Water Licenses, can be updated, modified, and submitted to the NWB for an appropriate review process. Agnico Eagle is compliant with the Conditions of the licenses with respect to updates to an ICRP. The following Conditions are from the Meadowbank and Whale Tail licenses (emphasis added):

2AM-MEA1530 Part B, Item 13: The Licensee shall, for all Plans submitted under this Licence, implement the Plan as approved by the Board in writing. The Board has approved (or accepted) the following Plans for implementation under the relevant sections in the Licence. Any changes to the plans deemed significant shall be reviewed by the Board to determine the process for the Board's review and approval of the amendment to the plan(s). Reflecting the scale and scope of the future changes to an approved plan, the Board may subsequently process the changes as solely an amendment to the plan, as a Modification under Part G of the Licence, or as an Amendment to the Licence.

2AM-MEA1530 Part B, Item 16. The Licensee shall review the Plans or Manuals referred to in this Licence as required by changes in operation and/or technology and modify the Plans or Manuals accordingly. Revisions to the Plans or Manuals are to be submitted in the form of an Addendum to be included with the Annual Report required by Part B, Item 2, complete with a revisions list detailing where significant content changes are made.

Note: The NWB has provided guidance that if a Plan has significant content changes, then they are to be submitted outside of the Annual Report process.

2AM-WTP1830 Part B, Item 13: The Licensee shall implement the following Plans also required under the Type "A" Water Licence 2AM-MEA1530 as approved (or accepted) by the Board. Any future updates to these Plans approved (or accepted) under the Type "A" Water Licence 2AM-MEA1530 or this Licence shall be applicable to both 2AM-MEA1530 and 2AM-WTP1830 Licences. Any changes to the plans deemed significant shall be reviewed by the Board to determine the process for the Board's review and approval of the amendment to the plan(s).

2AM-WTP1830 Part B, Item 14. The Licensee shall, for all Plans submitted under this Licence, implement the Plan as approved by the Board in writing. The Board has approved (or accepted) the following Plans for implementation under the relevant sections in the Licence. Any changes to the plans deemed significant shall be reviewed by the Board to determine the process for the Board's review and approval of the amendment to the plan(s). Reflecting the scale and scope of the future changes to an approved plan, the Board may subsequently process the changes as solely an amendment to the plan, as a Modification under Part G of the Licence, or as an Amendment to the Licence.



Note: The NWB has provided guidance that if a Plan has significant content changes, then they are to be submitted outside of the Annual Report process.

We recognize there are technical comments to address, which are being done through this response package. However, the technical evidence put forward by Agnico Eagle in its submission is reliable and supports any updates to the ICRP.

Table CIRNAC-6-1 provides the main updates from the Meadowbank ICRP (2019 Rev1, Mar 27 2020) and the Whale Tail Pit ICRP (2019) to the current Meadowbank Complex ICRP (Dec 2025 v1).

CIRNAC Reply:

Table 6-1 generally responds to the request. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

7. Change to the approved Tailings Storage Facility (TSF) design basis

Comment:

The TSF closure concept presented in the Interim ICRP represents a change from the closure basis relied upon during original project approvals. Project Certificate No. 004 was issued with the expectation that tailings would remain frozen following closure. The revised concept accepts that thaw will extend through the proposed 2-m cover and into the tailings shortly after closure, with further deepening of thaw under future climate conditions, as shown in the thermal modelling in Appendix C to Appendix 6J-B.

Allowing post-closure thaw of tailings represents a material change in closure philosophy. This change alters the long-term assumptions regarding tailings geochemistry and containment. Based on technical discussions in 2025, KivIA has indicated concern with allowing thaw penetration into the tailings. Proceeding with this approach without clear alignment risks departing from expectations established during project approval.

Recommendation:

(R-07) CIRNAC recommends that AEM should provide evidence that KivIA does not oppose the revised TSF closure approach and to evaluate whether additional mitigation measures are required to address long-term tailings thaw and stability prior to advancing closure construction.

Agnico Eagle Response:

In the submission to the NWB, the KIA provided technical comments on the ICRP. These are addressed in this response package.

See response to KivIA-03 for further details.

CIRNAC Reply:

AEM's response does not relate to the request.



8. TSF closure strategy is not ready to be treated as “final”

Comment:

The ICRP and Appendix 6J state that the TSF closure strategy should be considered final and approved in advance of the site-wide Final Closure and Reclamation Plan (FCRP), with construction proposed to begin in 2026. At the same time, Appendix 6J-A describes the TSF design as conceptual and notes that detailed design work remains outstanding.

Approving a final closure strategy at the conceptual design stage is premature. This limits the ability to respond to findings from detailed engineering, site-wide integration, or updated performance assessments. For a facility of this scale, this approach introduces unnecessary risk.

Recommendation:

(R-08) CIRNAC recommends that AEM should treat TSF closure works as progressive reclamation only, with any approval explicitly conditional on the submission and approval of detailed engineering designs and recognition that the design may change as work advances.

Agnico Eagle Response:

There is nothing unique about the approval of the closure strategy for the TSF compared to construction of other mining facilities that requires an approval as noted by CIRNAC. The scope of the Type A Water Licence explicitly includes closure and progressive reclamation. The final closure strategy for the TSF has been provided in Appendix 6J. As presented, this is the preferred option, signed off by the IRB, that derisks the facility based on the evidence and expertise of Agnico Eagle and the IRB.

CIRNAC also has not provided any evidence to validate its suggestion that the approach to the closure of the TSF described in the ICRP and Appendix 6J-A introduces risk. As described in detail in the ICRP and Appendix 6J-A, monitoring of the cover will proceed once progressive reclamation of the TSF is complete and the TSF is closed.

CIRNAC Reply:

CIRNAC has stated and maintains that there is risk associated with advancing a single closure component as “final” prior to finalizing the CRP for the entire site. CIRNAC maintains that any closure works that are implemented should be treated as progressive reclamation and not classified as final until such time that a fully integrated FCRP has been submitted and approved by the NWB.



9. Risk of advancing TSF closure ahead of integrated site-wide closure planning

Comment:

AEM is seeking approval of the TSF closure strategy ahead of a fully integrated site-wide closure plan. The TSF is strongly linked to other closure components, particularly long-term water management, seepage collection, monitoring requirements, and post-closure contingencies. Advancing TSF closure in isolation increases the risk that assumptions embedded in the TSF design will later conflict with site-wide closure requirements.

Recommendation:

(R-09) CIRNAC recommends that AEM should justify the need for early “approval” of the TSF closure strategy and to demonstrate that advancing TSF closure ahead of the full Closure and Reclamation Plan (CRP) will not constrain or increase risk to integrated site-wide closure decisions, particularly those related to water management.

Agnico Eagle Response:

Please refer to responses to CIRNAC-02 and CIRNAC-08.

CIRNAC Reply:

Refer to the status updates for CIRNAC-02 and CIRNAC-08.

10. Closure objectives and criteria are not measurable

Comment:

The TSF closure objectives presented in Table 1 of Appendix 6J are generally reasonable. However, the associated criteria are largely qualitative and not easily verifiable. Many criteria are framed in terms of design intent or modelled behaviour rather than measurable performance thresholds.

This makes it difficult to confirm closure success, interpret monitoring data, define triggers for corrective action, or support future security reduction. Given that all TSF seepage is routed to Collection Pond 23, water quality at that location is the primary performance metric and should be reflected directly in the criteria.

Recommendation:

(R-10) CIRNAC recommends that AEM should revise the TSF closure criteria to include explicit, quantitative performance thresholds, including concentration-based water quality limits at Collection Pond 23, defined averaging periods, allowable exceedances, and measurable indicators of cover and physical performance.

**Agnico Eagle Response:**

The closure and reclamation plan refers to achieving chemical stability by meeting site specific water quality objectives (SSWQO) or Canadian Council of Ministers of the Environment (CCME) guidelines. These criteria are concentration-based water quality limits that apply to the TSF runoff water collected in Collection Pond 23.

CIRNAC Reply:

The response generally responds to the request. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

11. No TSF-specific post-closure Trigger Action Response Plan (TARP)**Comment:**

The TSF closure approach relies on long-term passive performance supported by monitoring. The ICRP does not define trigger thresholds or response actions if post-closure conditions deviate from expectations. For a facility of this size and consequence, reliance on monitoring without predefined responses is a gap in the closure strategy.

Recommendation:

(R-11) CIRNAC recommends that AEM should develop a TSF-specific post-closure TARP that defines measurable triggers, response actions, and reporting requirements, with triggers tied directly to water quality at Collection Pond 23 and other key TSF performance indicators.

Agnico Eagle Response:

Agnico Eagle agrees with CIRNAC on the necessity of a TSF-specific post-closure TARPs and is working towards developing them, with input from a third-party reviewer and the design engineer. Triggers will be tied directly to water quality and other TSF performance indicators. The TARP will be part of a TSF Closure OMS Manual.

CIRNAC Reply:

AEM agrees that the requested information is necessary and has committed to providing it. However, given the importance of the TARP in making future decisions regarding the management of tailings during closure, the closure strategy for the TSF should not be classified as final until the TARP is available for review and approval.



12. Geotechnical risks of thicker covers are not demonstrated

Comment:

The ICRP states that increasing the TSF cover thickness beyond 2 m would introduce geotechnical risks due to increased mass loading. The submission does not describe the relevant failure modes or quantify the associated risks. Without this information, the stated trade-off between thermal performance and geotechnical risk cannot be evaluated.

Recommendation:

(R-12) CIRNAC recommends that AEM should identify and quantify the geotechnical failure modes associated with increased cover thickness and demonstrate how these risks compare to the proposed 2 m cover.

Agnico Eagle Response:

Agnico Eagle is in the process of finalizing the detailed design of the TSF cover. One major aspect of this work is the detailed geotechnical design of the cover and understanding the cover impact on the TSF structures. This includes seepage analysis, stability analysis, thermal analysis, and settlement analysis.

CIRNAC Reply:

AEM's response does not address the request, which was raised because AEM cited geotechnical risk as a primary reason that the cover thickness could not be increased. CIRNAC also notes that AEM indicates they are "finalizing the detailed design". The closure concept should not be classified as "final" until the detailed designs are available for review and approval.

13. Referenced supporting studies are not provided

Comment:

Appendix 6J-A refers to test pitting, porewater chemistry, and numerical modelling used to assess tailings saturation, oxidation state, and lateral flow behaviour. The underlying data and analyses are not included in the submission. These studies appear to be central to the justification of the closure design.

Recommendation:

(R-13) CIRNAC recommends that AEM should submit the test pit logs, porewater chemistry results, and numerical modelling documentation referenced in Appendix 6J-A, with sufficient detail to allow for independent technical review.

**Agnico Eagle Response:**

Agnico Eagle appreciates the recommendation; however, the test pitting, porewater chemistry, and the numerical modelling referenced in Appendix 6J-A are in reference to the work completed for the Feasibility Study Report that is not part of this ICRP submission. For reference of TSF runoff water quality and quantity predictions, please refer to Appendix 6-E (Lorax 2024) that details TSF source terms driving the contaminant transport model. For all other information related to the TSF, please refer to Appendix 6-J, 6J-A and 6J-B.

CIRNAC Reply:

AEM has not provided the requested information, which is available. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

14. No structured post-closure failure modes assessment**Comment:**

The ICRP considers climate-related performance of the TSF cover but does not include a structured assessment of post-closure geotechnical and hydrotechnical failure modes. Climate change is only one source of risk. Other credible failure mechanisms include erosion, settlement, internal drainage changes, and long-term degradation of infrastructure.

Recommendation:

(R-14) CIRNAC recommends that AEM should complete a post-closure Failure Modes and Effects Assessment for the TSF focused on geotechnical and hydrotechnical failure modes, with clear linkages to monitoring, TARPs, and mitigation measures.

Agnico Eagle Response:

In 2025, Agnico Eagle and the design engineer completed a Failure Modes and Effects Assessment (FMEA) for the TSF cover that assessed risks over the Operations Phase, Closure Phase, and Post-Closure Phase. This included a focus on geotechnical and hydrotechnical failure modes. Third-party review of the FMEA by the TSF dike designer will take place in 2026.

CIRNAC Reply:

AEM has not provided the requested information, which is available. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



15. Cold-regions cover performance

Comment:

The TSF isolation cover will operate in a cold-regions environment where ice lensing, frost heave, solifluction, and differential settlement can affect performance. The ICRP does not explicitly evaluate the design against these mechanisms. Reliance on general modelling and design intent is not sufficient to demonstrate long-term performance.

Recommendation:

(R-15) CIRNAC recommends that AEM should evaluate the TSF cover design against the Cold Regions Cover System Design Technical Guidance Document (MEND, 2012), explicitly addressing known cold-regions failure mechanisms and their implications for long-term performance.

Agnico Eagle Response:

Agnico Eagle, via design engineers Okane Consulting, have evaluated the TSF cover design against the MEND 2012 guidance document, which was drafted by Okane Consulting. As indicated in CIRNAC-12, Agnico Eagle is continuing work on the detailed design of the TSF. Also indicated in CIRNAC-14, Agnico Eagle has also completed an FMEA of the TSF in 2025.

CIRNAC Reply:

AEM has not provided the requested information, which is available. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

16. Rationale for strategy change

Comment:

The revised post-closure pit water management approach (i.e., pump to Vault versus treatment and discharge to Portage Lake) represents a material change from the concept evaluated at approval, but the submission does not clearly explain why the previously approved approach is no longer suitable or what specific deficiencies it had.

Recommendation:

(R-16) CIRNAC recommends that AEM should provide a structured rationale for the strategy change, including the technical basis for rejecting the prior approach and a clear statement of the new objectives and constraints driving the revision.

Agnico Eagle Response:

Agnico Eagle does not agree that the transfer of water to Vault Pit is a material change. As described in CIRNAC-17, the overarching water management strategy has not changed



from what was previously proposed. What has changed from the previously proposed strategy is how process water is treated and distributed. Where the previous strategy relied on active treatment of process water and discharge to the environment, the new strategy utilizes the concepts of aeration and meromixis to optimize active water treatment and reduce environmental discharge.

CIRNAC Reply:

AEM has not provided the requested information. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept. For the record, CIRNAC does not support AEM's conclusion that the "overarching water management strategy has not changed from what was previously proposed". The change represents a significant deviation from the prior approach.

17. Alternatives analysis (Multiple Accounts Analysis (MAA)/options screening)

Comment:

The proposed pipeline transfer and permanent storage of partially treated water in Vault Pit appears to have been selected without a transparent, systematic comparison to feasible alternatives for managing pit reclaim water and achieving post-closure compliance.

Recommendation:

(R-17) CIRNAC recommends that AEM should conduct a formal alternatives evaluation (MAA or equivalent) comparing credible water management concepts on environmental performance, long-term liability, constructability, operational risk, regulatory fit, and cost.

Agnico Eagle Response:

Agnico Eagle does not believe an MAA is needed for water management, as the overarching water management strategy has not changed from what was previously proposed, and the key components remain the same:

- Flooding the open pits at closure.
- Treat water, whether via active treatment, in-situ/aeration method, or some combination.
- Discharge treated water to the environment.

CIRNAC Reply:

AEM has not provided the requested information. Preparation of an MAA is a standard practice for closure decision-making and is necessary to demonstrate that the preferred closure concept was selected through a robust process. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept. For the record, CIRNAC does not support AEM's conclusion that the "overarching water



management strategy has not changed from what was previously proposed”. The change represents a significant deviation from the prior approach.

18. Meromixis feasibility and verification

Comment:

The revised strategy relies on long-term meromixis in Vault Pit to isolate non-compliant water at depth, but the submission does not provide sufficient modelling or site-specific evidence to demonstrate that stable stratification will be maintained over the long term.

Recommendation:

(R-18) CIRNAC recommends that AEM should perform quantitative modelling to demonstrate meromixis stability under realistic forcing conditions, including clear performance criteria and monitoring parameters that would confirm stratification is behaving as assumed.

Agnico Eagle Response:

Agnico Eagle has conducted quantitative modelling (Gold Sim) to predict long-term water quality within Vault Pit, incorporating hydrodynamics and regional hydrology. The results of the analysis are summarized in the Water Balance Water Quality Model (Appendix 6-E) report.

CIRNAC Reply:

Appendix 6E is simply the Water Quality and Load Balance Model for the entire site. It does not present the requested modelling to demonstrate meromixis stability. Further, the response does not address other aspects of the request (e.g., performance criteria and monitoring parameters to confirm stratification is occurring as assumed. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

19. Meromixis failure modes and contingency planning

Comment:

The submission does not present a credible failure-mode assessment for loss of stratification (e.g., extreme storms, unusual thermal conditions, subaqueous slope failure, operational upsets) or describe what actions would be taken if meromixis weakens or fails.

**Recommendation:**

(R-19) CIRNAC recommends that AEM should conduct a failure modes assessment specific to Vault Pit stratification and a contingency response plan (triggers, actions, equipment/logistics) for partial or full mixing scenarios.

Agnico Eagle Response:

Agnico Eagle appreciates the comment. Sensitivity analysis of failure modes will be part of the quantitative analysis to be provided when available.

CIRNAC Reply:

The request has not been addressed. Until the information is provided, permanently storing reclaim water permanently in the Vault Pit has not been proven as a viable closure concept. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

20. Freshwater cap depth and aquatic life protection**Comment:**

The basis for the proposed freshwater cap thickness (e.g., 15 m) is not clearly tied to protection of aquatic life or to predicted mixing and exposure pathways, particularly if partial mixing occurs.

Recommendation:

(R-20) CIRNAC recommends that AEM should explicitly demonstrate that the freshwater cap depth is protective of aquatic life under expected and upset conditions, including how criteria will be evaluated pre- and post-connection to receiving waters.

Agnico Eagle Response:

As stated in CIRNAC-18, Agnico Eagle has demonstrated in the WBWQM report that Vault Pit freshwater cap will meet CCME or SSWQO post-closure. The morphology of Vault Pit reduces the magnitude of mixing of bottom and top water layers. Therefore, concentrations in the freshwater cap are predicted to decrease over time due to the regional hydrologic water balance (runoff mixing).

CIRNAC Reply:

The response does not address the request which seeks clarification that the cap depth is adequate, not the quality of water within the cap, which is what AEM's response is limited to. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



21. Regulatory acceptability of “dirty water at depth”

Comment:

The strategy intentionally maintains non-compliant water in a flooded pit that is intended to become connected aquatic habitat, but the submission does not demonstrate how this is consistent with applicable federal legislation and regulator expectations.

Recommendation:

(R-21) CIRNAC recommends that AEM should provide written confirmation (or documented engagement outcomes) from relevant federal regulators (e.g., Environment and Climate Change Canada (ECCC)/Fisheries and Oceans Canada (DFO), as applicable) addressing the acceptability of the approach and any conditions or constraints that would apply.

Agnico Eagle Response:

Agnico Eagle appreciates CIRNAC's comment. The NWB process for reviewing the closure and reclamation plan includes comment period that includes the KivIA, ECCC, and DFO. Those interveners will have an opportunity to comment on the submitted information by Agnico Eagle.

CIRNAC Reply:

AEM has not provided the requested information. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

22. Pipeline transfer risk and mitigation

Comment:

Transferring partially treated contaminated water many kilometres by pipeline introduces new failure pathways (rupture/leak, valve failure, freezing, wildlife interactions, spill response limitations) that are not fully characterized in the submission.

Recommendation:

(R-22) CIRNAC recommends that AEM should conduct a pipeline risk assessment and mitigation package, including credible rupture scenarios, spill consequence analysis, detection/automatic isolation, seasonal operability, and response planning appropriate for remote Nunavut conditions.

Agnico Eagle Response:

As per Agnico Eagle's discussions with CIRNAC on February 20, 2025, the purpose of the water distribution line is to transfer contact water from one pit to another within an already impacted footprint. The distribution line was approved by the NWB (March 25, 2025) and is an approved activity on site.

**CIRNAC Reply:**

AEM has not performed the requested risk assessment, nor have they indicated what mitigation strategies would be used in the event of a failure scenario occurring. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

23. Portage/Goose pit re-flooding assumptions (tailings stability and water quality)**Comment:**

The revised plan still relies on re-flooded pits with in-pit tailings behaving predictably over the long term, but the submission does not clearly demonstrate that the proposed water cover depth prevents tailings resuspension and that long-term water quality will remain acceptable.

Recommendation:

(R-23) CIRNAC recommends that AEM should provide modelling and/or supporting evidence for (a) long-term water quality evolution in re-flooded pits with tailings, and (b) adequacy of minimum water cover depths to prevent resuspension under expected hydrodynamic and ice-related conditions.

Agnico Eagle Response:

Agnico Eagle has conducted quantitative modelling (GoldSim) to predict long-term water quality in the flooded pits. The results of the analysis are summarized in the Water Balance Water Quality Model (Appendix 6-E) report.

CIRNAC Reply:

AEM's water quality predictions only continue up until the pit lakes have been reconnected to surface water receivers and does not address the potential for post-closure recontamination of pit water. As a consequence, the modelling does not address either part of the request. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

24. Cost and liability transparency**Comment:**

The revised strategy likely shifts costs and risks across facilities and time (e.g., treatment duration, monitoring burden, potential long-term management), but the submission does not provide a clear comparison to the previously approved strategy.

**Recommendation:**

(R-24) CIRNAC recommends that AEM should provide a comparative cost and liability assessment between the revised and prior strategies, including long-term monitoring, contingency actions, and implications for financial assurance.

Agnico Eagle Response:

Section 8.3.5 of the Meadowbank Complex ICRP provides details to support the changes that were made to security. Tables 8.3-3 and 8.3-4 of the Meadowbank Complex ICRP provide a comparison of the current security holding against the updated estimate for Meadowbank and Whale Tail, respectively.

CIRNAC Reply:

CIRNAC is working with AEM and KivIA to update the Quantum of Security Estimate for the Meadowbank Complex.

25. Early Implementation of Unapproved Water Management Strategy**Comment:**

AEM is proposing to begin transferring partially treated reclaim water to the Vault Pit in 2026, prior to approval of a revised site-wide closure and reclamation plan, despite this approach being inconsistent with the currently approved Interim Closure and Reclamation Plan (ICRP). Initiating permanent placement of non-compliant water before regulatory approval introduces material regulatory and closure risk.

Recommendation:

(R-25) CIRNAC recommends that AEM should formally acknowledge that permanent disposal of partially treated water in the Vault Pit has not yet been approved, and that any early transfers are undertaken at AEM's risk, with the understanding that alternative or previously approved closure approaches may ultimately be required.

Agnico Eagle Response:

As per CIRNAC-22, the purpose of the water distribution line is to transfer contact water from one pit to another within an already impacted footprint, and the activity has been approved by the NWB (March 25, 2025).

CIRNAC Reply:

AEM did not address the request. CIRNAC is seeking clarification that AEM acknowledges that permanent disposal of water in the Vault Pit has not yet been approved.



26. Potential Requirement for Nunavut Impact Review Board (NIRB) Environmental Assessment Review

Comment:

The revised post-closure water management strategy represents a substantive departure from the water management concept that was assessed during the original environmental assessment for the Meadowbank Project. Given the scale of the change, the introduction of new risk pathways, and the long-term implications for pit lakes and receiving waters, it is unclear whether the revised approach has been adequately screened against NIRB referral criteria or whether additional public and regulatory review is warranted.

Recommendation:

(R-26) CIRNAC recommends that AEM should provide a formal assessment of whether the revised water management strategy triggers referral to NIRB under the NIRB process, including a clear rationale supporting the conclusion and documentation of any regulatory engagement supporting that conclusion.

Agnico Eagle Response:

An assessment through the NIRB is not required, as the overarching water management strategy has not changed from what was previously proposed and the key components remain the same:

- Flooding the open pits at closure.
- Treat Water, whether via active treatment, in-situ/aeration method, or some combination.
- Discharge treated water to the environment.

Based on a NuPPAA s.90 screening review and NIRB's project modification guidance, Agnico Eagle's water management strategy (including the Meadowbank–Vault water transfer line and associated storage/treatment adjustments) does not trigger referral to NIRB for further environmental assessment:

1. The activities occur within previously assessed/disturbed corridors and authorizations, do not introduce new residual effects or materially different effect pathways than those already evaluated, and are managed under existing licenses, monitoring, and mitigation.
2. Works are confined to existing project areas/linear corridors; no new mine development or new receiving environment is proposed.
3. With established mitigation, licensing (NWB/MDMER) compliance, and monitoring, no increase in magnitude or geographic extent of effects beyond FEIS predictions is anticipated.

In addition, Agnico Eagle completed a NuPPAA s.90 self-assessment for the Meadowbank–Vault water transfer line and submitted to the NWB at its request (submitted to NWB February 26, 2025). The NWB consulted the NIRB for determination, the NIRB concluded



(March 21, 2025) that the activity is within the non-significant amendment and a NIRB assessment was not required.

CIRNAC Reply:

For the record, CIRNAC does not support AEM's conclusion that the "overarching water management strategy has not changed from what was previously proposed". The change represents a significant deviation from the prior approach. It is CIRNAC's position that this significant change was not transparently communicated in the screening documentation that was submitted.

27. Post-closure water quality criteria are not clearly defined or differentiated

Comment:

The ICRP relies on the existing Water Licence criteria to frame closure performance, but it is not clearly stated whether post-closure water quality objectives are intended to be identical to operational criteria or whether a different set of post-closure criteria will be applied. While use of licence criteria is common, the document does not clearly articulate how reduced site presence, reliance on passive systems, and long-term uncertainty are accounted for in post-closure decision-making.

Recommendation:

(R-27) CIRNAC recommends that AEM should clearly state the post-closure water quality criteria, compliance points, and averaging periods that will govern pit reconnection and discharge decisions, and confirm whether these differ in any way from the current operational criteria and why.

Agnico Eagle Response:

The closure and reclamation plan states that a closure objective is "water quality is safe for humans, wildlife, and aquatic life" with the criteria of "water quality meets modelled predictions and relevant criteria, and is protective of human and ecological health" (ICRP, e.g., Table 4.3-1). The Human Health and Ecological Risk Assessment provided tables of the relevant criteria (Appendix D, Tables D-1, D-4a, D-7). Monitoring will confirm when post-closure criteria are achieved.

CIRNAC Reply:

AEM has not provided the requested information. Specifically, AEM has not stated the explicit post-closure water quality criteria, compliance points and averaging periods that will govern pit reconnection and discharge decisions. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



28. Lack of a structured Trigger Action Response Plan (TARP) and reconnection decision framework

Comment:

The ICRP and Appendix 6E describe predicted timelines for pit reconnection but do not define a structured decision framework for how reconnection decisions will be made based on monitoring results. Given the number of parameters, seasonal variability, and uncertainty in long-term predictions, reconnection cannot reasonably be treated as a single-criterion or single-date decision.

Recommendation:

(R-28) CIRNAC recommends that AEM should develop a post-closure water quality TARP that includes a decision tree for pit reconnection and Collection Pond 23 discharge, defining required parameters, trends, confirmation periods, and response actions if predictions are not met.

Agnico Eagle Response:

Agnico Eagle thanks CIRNAC for the recommendation. Closure and post-closure monitoring outlined in the CPCMP provide monitoring guideline for determining whether the required criteria are met to trigger certain actions, such as pit reconnection of Collection Pond 23.

CIRNAC Reply:

AEM has not committed to developing a TARP for post-closure water quality or a decision tree for reconnection. Consequently, the response does not address the request. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

29. Waste Rock Storage Facility (WRSF) wet-up and dynamic equilibrium may not be demonstrated

Comment:

The long-term water quality predictions in the ICRP rely on WRSF seepage rates and chemistry that are implicitly assumed to be representative of long-term, post-closure conditions. However, waste rock storage facilities typically require extended periods to fully wet up, particularly under cold-region conditions where infiltration, internal drainage, and freeze-thaw processes can significantly delay the development of steady seepage pathways. If wet-up is incomplete within the modelling period, early-time seepage volumes and concentrations may systematically under-represent long-term chemical loadings and fluxes, which has direct implications for predicted pit lake water quality, reconnection timing, and post-closure discharge performance. This uncertainty is potentially significant because key closure decisions (e.g., pit reconnection and treatment cessation) are being tied to



modelled outcomes that may precede true hydrologic and geochemical equilibrium in the WRSFs.

Recommendation:

(R-29) CIRNAC recommends that AEM should explicitly demonstrate, using model outputs, that WRSF seepage has reached hydrologic and geochemical dynamic equilibrium within the simulation period, including clear criteria for how equilibrium is defined. Where equilibrium is not achieved, extend the modelling horizon or apply bounding cases to ensure that long-term seepage rates and water quality are conservatively represented in closure and reconnection decision-making.

Agnico Eagle Response:

Assessment of the thermal and water balance regime (CIRNAC request) of the Meadowbank RSFs is ongoing, in concert with thermal monitoring, and measurement of contact water volumes and quality pumped from local sumps.

CIRNAC Reply:

AEM has not provided the requested information. On that basis, the proposed closure approaches for the WRSFs remain conceptual and subject to change, including any progressive reclamation that has occurred to date. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

30. Sensitivity and uncertainty analysis is insufficiently developed

Comment:

The post-closure water quality predictions presented in the ICRP and Appendix 6E are based on a series of critical assumptions related to source terms, hydrology, treatment performance, climate inputs, and mixing behaviour, many of which are subject to inherent uncertainty and natural variability. In several cases, predicted concentrations for key parameters are close to applicable criteria or are used to justify specific reconnection timelines, making the results particularly sensitive to relatively small changes in input assumptions. Without explicit sensitivity and uncertainty analyses, it is difficult to assess the robustness of the conclusions or to understand how deviations between predicted and observed conditions could affect closure outcomes and regulatory decisions.

Recommendation:

(R-30) CIRNAC recommends that AEM should complete and document sensitivity and uncertainty analyses for the water quality and water balance models, focusing on key assumptions and drivers that influence predicted compliance and reconnection timing. The results should clearly illustrate the range of plausible outcomes and identify which



parameters and assumptions most strongly affect post-closure water quality performance, to better inform risk-based decision-making and contingency planning.

Agnico Eagle Response:

Agnico Eagle thanks CIRNAC for the recommendation.

CIRNAC Reply:

AEM has not provided the requested information. CIRNAC maintains that AEM should complete and document sensitivity and uncertainty analyses for the water quality and water balance models. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

31. Role of in-pit tailings as a water quality source term is unclear

Comment:

The ICRP and Appendix 6E screen pit lake water quality against criteria at planned reconnection dates, but do not clearly describe how in-pit tailings are represented as long-term source terms in the modelling. Given their importance to turbidity, metals, and long-term water quality, this assumption should be explicit.

Recommendation:

(R-31) CIRNAC recommends that AEM should clearly document how in-pit tailings are represented in the water quality model, including source term assumptions, resuspension or diffusion mechanisms, and sensitivity of predicted pit lake chemistry to those assumptions.

Agnico Eagle Response:

Water quality and balance modelling methods are provided in Section 4.0 of Appendix 6-E, which also includes how in-pit tailings are represented in the water and load balance model. As described in Appendix 6-F, porewater flux from tailings will be negligible where the flux of parameters to the overlying water is approximately zero. Therefore, there are no source terms assumed from the tailings pore-water.

For tailings resuspension, Agnico Eagle has previously provided information (SNC-Lavalin, 2018. In-Pit Tailings Disposal Detailed Engineering Study, 651196-9000-40ER0001_PB, July 20th, 2018.) as part of the in-pit deposition water license amendment application (approved by NWB on March 29, 2019). The SNC-Lavalin report demonstrated that a water cover of 8 metres would prevent the resuspension of tailings, so this assumption has been carried forward in all modelling of tailings in flooded pits.

**CIRNAC Reply:**

AEM has not provided the requested information. Based on the information presented in appendices 6E and 6-F, the flux referred to corresponds to the consolidation of tailings and subsequent release of porewater. It does not appear to refer to subsequent diffusion through groundwater flows passing through the tailings and/or diffusion across the tailings/water interface. The response is therefore incomplete. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

32. Reconnection timing is highly sensitive to arsenic predictions**Comment:**

For Whale Tail in particular, arsenic appears to be the controlling parameter for reconnection timing, and concentrations are predicted to increase following flooding due to ongoing wall exposure. The ICRP does not clearly define the mitigations that will be considered if arsenic concentrations remain above predictions at the planned reconnection decision point.

Recommendation:

(R-32) CIRNAC recommends that AEM should define contingency approaches and mitigations for pit reconnection decisions where arsenic (or other key parameters) does not meet predicted concentrations, including delayed reconnection, additional treatment, or alternative end-state configurations.

Agnico Eagle Response:

Agnico Eagle, through the CPCMP, will continue monitoring water quality during active closure. During this period, the O-WTP will continue to operate until the water quality objectives for treatment are achieved. The water quality model currently projects 6 years of O-WTP operation being required. As indicated in the ICRP, Agnico Eagle will not reconnect the flooded pits with the regional watershed unless water quality criteria are met.

CIRNAC Reply:

AEM has not provided the requested information. CIRNAC maintains that AEM should provide explicit contingency approaches and mitigations for pit reconnection. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



33. Modelling horizon does not fully capture late-time source term evolution

Comment:

Water quality prediction plots and tables in Appendix 6E extend only to approximately 2069, despite source term projections being available well beyond that period and physical changes (e.g., active layer penetration of thick WRSF covers) expected later. This truncation limits evaluation of late-time water quality risks.

Recommendation:

(R-33) CIRNAC recommends that AEM should extend water quality predictions and plots to align with the full source term modelling period (or justify the cut-off), and present late-time results for key parameters (e.g., arsenic) that are relevant to pit lake reconnection and discharge decisions.

Agnico Eagle Response:

The long-term water quality of the flooded pits will be determined by the hydraulic residence time of flooded pit water, the rate of loading from the surrounding mine facilities, and the degree to which the flooded pit water mixes with the downstream receiving environment. To appropriately model the water quality post lake reconnection, the dike breach design will first need to be finalized. A final dike breach design would then inform a hydrodynamic model of the mixing characteristics within the reconnected flooded pit. These details and model updates can be completed after the dike breach design is developed.

CIRNAC Reply:

AEM has not provided the requested information. CIRNAC maintains that AEM should extend water quality predictions and plots to align with the full source term modelling period and present late time results for key parameters that are relevant to pit lake reconnection and discharge. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

34. Long-term recontamination risk from in-pit tailings

Comment:

The closure concept relies on removal of reclaim water, followed by reflooding of the Goose and Portage pits containing in-pit tailings, with the expectation that water quality will remain acceptable over the long term. While modelling has been used to support this assumption, the submission does not clearly demonstrate that the in-pit tailings will not act as a persistent or delayed source of contaminants through diffusion, porewater exchange, resuspension, or chemical evolution under flooded conditions. Given the long timeframes involved and the



importance of pit lake water quality to reconnection decisions, this represents a material uncertainty.

Recommendation:

(R-34) CIRNAC recommends that AEM should explicitly demonstrate with modelling and/or site-specific data, that in-pit tailings will not result in long-term degradation of pit lake water quality following reflooding, including consideration of diffusive fluxes, geochemical evolution, and potential disturbance mechanisms.

Agnico Eagle Response:

The 8 m water cover of tailings has already been assessed and approved as part of the In-pit Tailings Deposition Amendment, and is reflected in Project Certificate No.003, Term & Condition 19, under the 'new commentary'.

Additionally, at closure, the rate of porewater flux from tailings to the surface water will be negligible. Therefore, there will be no water quality exceedances. This conclusion is based on modelling completed by AtkinsRéalis (Appendix C of Appendix 6-F) that showed tailings consolidation occurs in the first 2-3 years after deposition (max flux rate of 0.004 m³/s to 0.007 m³/s depending on the model). After 2-3 years, the flux rate of porewater to the overlying water decreased to nil (zero) in the model.

Thermal and hydrogeological modelling including the 8 m water cover which was performed to address comments received from NRCAN during the review process. This document is available at: 181214 2AM-MEA1526 Update Thermal&Hydrogeological Modeling-IMLE.pdf. The NWB In-pit Tailings Deposition Reasons for Decision report (pages 31 to 37 2AM-MEA1526) summarizes the history and models done as part of the in-pit deposition. Further details on the history of the In-pit Tailings Deposition Amendment are available on the NWB Registry. Additional modelling and studies are not required as part of the ICRP as the work has already been completed and is approved through the NWB and NIRB.

CIRNAC Reply:

AEM has not provided the requested information. As indicated previously, AEM has not modelled long-term flux into the pit lakes, with the exception of porewater released through tailings consolidation. CIRNAC emphasizes that the 8 m cover concept was described during the approvals process for in-pit deposition but that the water cover thickness was not implicitly approved, as suggested by AEM. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



35. Removal of committed rock cover over in-pit tailings

Comment:

In the approved ICRP, AEM committed to placing granular rock covers over tailings in the Goose and Portage pits. The commitment was made in response to community concerns that were expressed during approvals processes for in-pit tailings disposal. The proposed updates to the ICRP remove this commitment without clearly demonstrating that site conditions, environmental context, or regulatory expectations have changed in a way that would justify revising the approved approach. Although Fisheries and Oceans Canada (DFO) has concluded the flooded pits do not qualify as acceptable offsetting habitat, aquatic biota (including fish) are likely to colonize portions of the flooded pits after closure. The rock cover would provide a physical barrier to limit direct contact between aquatic biota and tailings/sediments with elevated metal concentrations.

Recommendation:

(R-35) CIRNAC recommends that AEM should either: (i) provide clear evidence that the environmental context of in-pit tailings disposal has materially changed since the commitment was made and the practice was approved; or (ii) implement the previously committed rock cover over in-pit tailings.

Agnico Eagle Response:

The NIRB decision report (August 31, 2018) included the narrative and recommendation from ECCC: “that the tailings closure plans include an evaluation of the feasibility of introducing a rock cover above the tailings, and identify conditions where this may be warranted.”

As noted in Section 6.2.3 of the December 2025 ICRP, this closure option was assessed (Appendix 6-F) and is no longer viable, as an aggregate cover over the tailings is not required to mitigate risks to fish. Thus, the in-pit tailings rock cover is therefore not considered in this version of the ICRP.

CIRNAC Reply:

AEM has not provided the requested information. As indicated in earlier comments on this issue, AEM’s position that DFO does not accept the pit lakes as habitat offsetting does not mean that aquatic biota will not colonize the pits. Instead, it simply means that the pits will not be of sufficient quality to qualify for offsetting. CIRNAC requires the requested information to perform a technical analysis of AEM’s proposed closure concept.



36. Tailings resuspension and physical disturbance under flooded conditions

Comment:

The submission does not clearly address whether tailings resuspension could occur following reflooding due to thermal turnover, ice processes, density currents, slope instability, or external disturbances, particularly in the absence of a rock cover. Even infrequent resuspension events could affect turbidity, metal concentrations, and downstream water quality, with implications for reconnection and long-term monitoring.

Recommendation:

(R-36) CIRNAC recommends that AEM should assess tailings resuspension potential under flooded conditions, including identification of credible disturbance mechanisms and evaluation of whether additional mitigation (e.g., minimum water cover depth, localized armouring, or operational controls) is warranted.

Agnico Eagle Response:

Please refer to CIRNAC-34.

CIRNAC Reply:

AEM has not provided the requested information. Refer to the status update for CIRNAC-34. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

37. Regulatory and closure consistency of changing the in-pit tailings end state

Comment:

The decision to eliminate the in-pit tailings cover represents a substantive change from the closure concept under which in-pit deposition was originally approved. The submission does not clearly explain how this change aligns with regulatory expectations or whether it alters the risk profile that informed earlier approvals.

Recommendation:

(R-37) CIRNAC recommends that AEM should explicitly reconcile the revised in-pit tailings closure approach with prior approvals and commitments, and confirm whether additional regulatory review or concurrence is required as a result of this change.

Agnico Eagle Response:

Please refer to CIRNAC-34 and CIRNAC-35.

**CIRNAC Reply:**

AEM has not provided the requested information. Refer to the status update for CIRNAC-34 and CIRNAC-35. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

38. Status and suitability of partially treated reclaim water**Comment:**

The revised ICRP proposes transfer of partially treated reclaim water from the Goose and Portage pits for permanent storage into the Vault Pit. Although not stated in the submission, CIRNAC assumes that AEM is proposing to store this partially treated water in the Vault Pit because it is not suitable for discharge to the receiving environment (i.e., it does not meet applicable water quality criteria). However, the submission does not identify which parameters remain above criteria following partial treatment, nor the magnitude of exceedance relative to discharge requirements. This information is necessary to understand both the limitations of the current treatment approach and the rationale for selecting permanent storage over discharge.

Recommendation:

(R-38) CIRNAC recommends that AEM should explicitly identify the parameters in partially treated reclaim water that exceed applicable discharge criteria, including expected concentrations, comparison to criteria, and whether those exceedances are temporary or persistent.

Agnico Eagle Response:

It is assumed the reviewer is referring to water being transferred to the base of Vault Pit (see responses to CIRNAC-18 and CIRNAC-20), and refer to Appendix 6-E for more details on the water model and predicted chemistry. This water will not be discharged to the receiving environment and thus there are no discharge criteria.

CIRNAC Reply:

AEM has not provided the requested information. For the record, CIRNAC does not agree with AEM's conclusion that water stored in perpetuity in the base of the Vault Pit should not be assessed against applicable discharge criteria. Until such time that AEM has demonstrated that contaminated water will remain permanently contained in the base of the pit there is a risk of ongoing environmental exposures. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



39. Rationale for abandoning the approved treatment-and-discharge strategy

Comment:

The approved ICRP closure concept was based on treatment of reclaim water in the Goose and Portage pits followed by discharge to the environment, with pit reflooding and reconnection thereafter. The revised strategy replaces this approach with permanent storage of partially treated water in the Vault Pit, but the submission does not clearly explain why the previously approved strategy is no longer viable or how the revised approach is environmentally superior.

Recommendation:

(R-39) CIRNAC recommends that AEM should provide a clear, structured rationale for moving away from the approved treatment-and-discharge strategy, including comparison of environmental performance, long-term risk, regulatory implications, and closure liability between the two approaches.

Agnico Eagle Response:

As noted in response to CIRNAC-16 and CIRNAC-17, the overarching water management strategy has not changed from what was previously proposed.

As indicated in the ICRP, Table 1.6-1, Agnico Eagle gives preference to closure solutions that reduce the maintenance requirements for closure. As presented in Appendix 6-E, the present closure strategy for treatment will achieve the chemical stability objective, particularly in the flooded pits. Furthermore, the current strategy will reduce pumping required from Wally Lake for active flooding of Vault Pit, further reducing active closure activities. Therefore, by transitioning to a more passive treatment strategy, Agnico Eagle has reduced maintenance requirements while still meeting chemical criteria.

CIRNAC Reply:

AEM has not provided the requested information. Specifically, they have not provided a clear, structured rationale for moving away from the approved treatment and discharge strategy. Further, CIRNAC concludes that there will be potentially greater risks maintenance requirements associated with the Vault Pit water management option when compared to the base case concept of treating and discharging to the Portage Lakes. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



40. Demonstration of in-pit treatment performance

Comment:

AEM reports that in-pit aeration initiated in Goose Pit has been successful in removing thiocyanate and enhancing nitrogen compound degradation. However, no detailed technical documentation has been provided to substantiate treatment performance, limiting the ability to evaluate the effectiveness and reliability of in-pit treatment of nitrogen compounds and metals as a closure measure.

Recommendation:

(R-40) CIRNAC recommends that AEM should provide technical performance reports for in-pit water treatment conducted to date, including monitoring data, treatment mechanisms, seasonal limitations, and implications for long-term closure water quality.

Agnico Eagle Response:

Agnico Eagle thanks CIRNAC for the recommendation. Agnico Eagle will provide treatment performance data when they are available in due time.

CIRNAC Reply:

AEM has not provided the requested information. AEM has been running the treatment program for at least one season yet has not provided updates on the efficacy of treatment. Consequently, CIRNAC is unable to confirm whether the approach will achieve the closure objectives. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

41. Status and readiness of the closure water treatment system

Comment:

Notwithstanding AEM's new proposal to deposit non-compliant water in the base of the Vault Pit, the revised ICRP indicates that AEM continues to assess water treatment options that are capable of treating reclaim water to levels that would be amenable to direct discharge to the environment, as per the approved ICRP. In this regard, AEM reports that bench-scale testing and semi-passive treatment development have been ongoing since 2021. Despite this, a comprehensive description of the closure Water Treatment Plan (WTP) design, performance assumptions, and readiness has not been provided, limiting CIRNAC's ability to assess feasibility, residual risk, and associated security requirements.

Recommendation:

(R-41) CIRNAC recommends that AEM should submit a detailed description of the proposed closure water treatment system, including treatment technologies, testing results, design



criteria, expected effluent quality, operational duration, and implications for closure reclamation security.

Agnico Eagle Response:

Agnico Eagle thanks CIRNAC for the recommendation. Details on treatment technologies and their expected effluent quality have been provided in the WBWQM report (Appendix 6-E). Information on closure reclamation security was provided in Appendix 8-A.

CIRNAC Reply:

AEM has not provided the requested information. The information that has been provided is dated and is based on the previously committed treat and discharge water management strategy, not the approach AEM is now proposing. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

42. Consistency with the approved ICRP

Comment:

Given that reclaim water is already proposed to undergo aeration and active treatment prior to transfer to the Vault Pit, it is unclear why this water cannot be treated to meet applicable discharge criteria and released to the environment, consistent with the approved ICRP. The revised approach appears to introduce permanent storage of treated but non-compliant water without clearly demonstrating that further treatment to discharge standards is infeasible or unreasonable.

Recommendation:

(R-42) CIRNAC recommends that AEM should explicitly demonstrate why treated reclaim water cannot be further treated to meet discharge criteria under the approved closure strategy, including identification of limiting parameters, technical constraints, or disproportionate impacts.

Agnico Eagle Response:

Please refer to CIRNAC-39.

CIRNAC Reply:

AEM has not provided the requested information, including within the response to CIRNAC-39. Consequently, AEM has not demonstrated why the previously reviewed water management strategy is no longer viable. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.



43. Basis for differing Waste Rock Storage Facility (WRSF) cover thicknesses (Meadowbank vs. Whale Tail)

Comment:

The closure design specifies a 4.0-m non-potentially acid generating/metal leaching (NPAG/NML) cover for Meadowbank WRSFs and a 4.7 m cover for Whale Tail WRSFs. Based on the information provided, the conditions influencing thermal performance appear to be generally similar between the two sites (e.g., climate, waste rock properties, pile geometry, and exposure). Given these similarities, it is unclear why the cover design thicknesses for the two sites are different. Without an explicit comparison, it is difficult to confirm that both designs provide equivalent long-term performance.

Recommendation:

(R-43) CIRNAC recommends that AEM should clearly document the technical basis for differing WRSF cover thicknesses between the Meadowbank and Whale Tail sites, including a side-by-side comparison of thermal modelling inputs, assumptions, and performance outcomes.

Agnico Eagle Response:

Section 6.5.1 of the ICRP notes that “The Vault WRSF contains a majority NPAG/NML material and is not expected to require a cover, thus will be left in its current configuration.”

In addition, Section 6.5.3.2 of the ICRP states the Vault WRSF geochemical predictions indicate that a capping layer will not be required at the Vault WRSF as most waste rock produced is NPAG/NML. To date, through the ARD testing program, it has been determined that approximately 85.5% of the waste rock generated is NPAG/NML. As a precaution, PAG/ML waste rock was placed in the middle of the Vault WRSF and this material will be covered with at least 4m of NPAG/NML to minimize any generation of ARD/ML and to promote freeze back (Waste Rock and Tailings Management Plan version 13).

Further, as outlined in the ICRP, Section 6.5.3.2 “...Based on the cover thermal model results, the Whale Tail WRSF and the IVR WRSF will be covered with a 4.7 m thick closure cover that will be constructed with NPAG/NML waste rock (Okane 2018b). The intent of the cover is to contain the yearly active layer inside the thickness of the cover, and to maintain a temperature below 0°C for the underlying rock (e.g., Figure 6.5-1). Additionally, the cover aims to limit acid generating reactions and migration of contaminants. Similarly to Portage WRSF, the likelihood of a 4.7 m cover system being insufficient is very low due to the factors listed previously for Meadowbank’s WRSFs (e.g., low volumetric water content, low pyrite content, etc.).”



These two covers have been presented and approved through past Water Licence applications and are not new concepts.

CIRNAC Reply:

AEM has not provided the requested information. The comment was clearly looking for clarification on justification for different WRSF cover designs between the Meadowbank and Whale Tail WRSFs. For the record, CIRNAC emphasizes that the previously presented WRSF cover approaches were not approved as “final”. CIRNAC requires the requested information to perform a technical analysis of AEM’s proposed closure concept.

44. Active layer penetration through the thermal covers

Comment:

Thermal modelling referenced in the ICRP and Water Quality and Load Balance Model (WQLBM) indicates that, under future climate scenarios, the active layer within the WRSFs is expected to deepen to approximately 5 m (and locally up to ~6 m by 2170), exceeding the design thickness of the NPAG/NML covers. While some thaw below the cover appears to have been anticipated in the modelling, the design rationale for selecting cover thicknesses that are less than the predicted active layer depth is not clearly articulated in the ICRP.

Recommendation:

(R-44) CIRNAC recommends that AEM should explicitly explain why cover thicknesses were not increased to fully accommodate predicted active layer depths, and to quantitatively demonstrate how thaw beneath the covers affects long-term seepage quality and loading, including confirmation that this effect is conservatively captured in the water quality source terms.

Agnico Eagle Response:

Agnico Eagle updated the thermal modelling for the Portage WRSF in 2023 to examine if the active layer would extend below the NPAG cover. The report (Appendix 6-H of the ICRP) concluded, while annual thaw below the WRSF cover system is expected, the likelihood of a 4.0 m cover system thickness being insufficient, leading to unacceptable water quality in the receiver is expected to remain very low. This is due to several factors, including:

- Low volumetric water content in the thawed waste rock, resulting in low likelihood of mobilization of seepage from waste rock;
- Lower pyrite oxidation rates within the thawed waste rock compared to the cover system material (because of consistent near-freezing temperatures within the waste rock) resulting in low to moderate likelihood of production of metal leaching and acid rock drainage (ML/ARD) products;



- Limited volume of PAG/ML waste rock in the estimated thawed waste rock zone, resulting in low likelihood of production of ML/ARD products; and
- Limited interaction between infiltrating water and PAG/ML waste rock due to the development of ice lenses in the upper profile of the RSF and frozen conditions at the base of the RSF.

CIRNAC Reply:

AEM has not provided the requested information. When the Meadowbank and Whale Tail projects were originally approved, it was based on the placement of maintaining a full thermal cover that prevented the penetration of the active zone into materials with ARD/ML potential. Based on the revised modelling, AEM is now predicting that annual thawing will penetrate multiple meters into waste rock. The environmental implications of this have not yet been fully assessed and, by extension, it has not been determined whether the WRSF cover thicknesses are adequate. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

45. Availability and adequacy of detailed thermal modelling reports

Comment:

The ICRP and WQLBM reference thermal modelling work (e.g., Okane, 2022) indicating significant future active layer deepening, particularly at Whale Tail; however, the detailed thermal modelling reports themselves do not appear to be included in the submission. Summary statements are insufficient to independently assess model assumptions, boundary conditions, calibration, and uncertainty.

Recommendation:

(R-45) CIRNAC recommends that AEM should provide updated thermal modelling reports for both Meadowbank and Whale Tail WRSFs, including full documentation of methods, assumptions, calibration, and climate scenarios, to support independent technical review.

Agnico Eagle Response:

The cover design for the Portage WRSF was reviewed (see Appendix 6-H of the ICRP).

The cover design for the Whale Tail and IVR WRSFs was provided as part of the previous Water Licence Amendment process (Agnico Eagle 2019).

Whale Tail Pit, WRSF 60-day notice – Whale Tail and IVR WRSFs – Phase 2 and Appendix (in 6 parts)

- Part 1: 191220 2AM-WTP1826 WRSF 60-Day Notice - Whale Tail IVR WRSFs - Phase 2 and Appendix_part 1-IMLE.pdf
- Part 2: 191220 2AM-WTP1826 WRSF 60-Day Notice - Whale Tail IVR WRSFs - Phase 2 and Appendix_part 2-IMLE.pdf



- Part 3: 191220 2AM-WTP1826 WRSF 60-Day Notice - Whale Tail IVR WRSFs - Phase 2 and Appendix_part 3-IMLE.pdf
 - Part 4: 191220 2AM-WTP1826 WRSF 60-Day Notice - Whale Tail IVR WRSFs - Phase 2 and Appendix_part 4-IMLE.pdf
 - Part 5: 191220 2AM-WTP1826 WRSF 60-Day Notice - Whale Tail IVR WRSFs - Phase 2 and Appendix_part 5-IMLE.pdf
 - Part 6: 191220 2AM-WTP1826 WRSF 60-Day Notice - Whale Tail IVR WRSFs - Phase 2 and Appendix_part 6.pdf
- Agnico Eagle. 2019. Whale Tail Pit Expansion Project NWB Water Licence 2AM-WTP1826 Amendment.
May 2019.

CIRNAC Reply:

AEM has not provided the requested information. Refer to the status of CIRNAC-45. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

46. Progressive reclamation verification

Comment:

AEM indicates that WRSF side slopes and benches have been progressively reclaimed as construction has advanced, but the submission does not provide detailed documentation demonstrating that the constructed covers meet the approved design specifications (e.g., thickness, geometry, continuity). Without formal as-built documentation, CIRNAC cannot confirm closure conformance.

Recommendation:

(R-46) CIRNAC recommends that AEM should provide formal as-built documentation for progressively reclaimed WRSF areas, including pre- and post-cover placement surveys, cover thickness verification, NPAG material verification, and confirmation of conformity with the approved closure design.

Agnico Eagle Response:

Agnico Eagle thanks CIRNAC for the recommendation. As-built documents are provided as they are made available.

CIRNAC Reply:

AEM has not provided the requested information. While CIRNAC encourages progressive reclamation where appropriate, the Department has not received any detailed documentation that describes the progressive reclamation that has occurred to date. To



avoid future risk and potential delays, CIRNAC recommends that the requested information be provided.

47. Consideration of non-geochemical closure factors (e.g., wildlife interaction)

Comment:

While geochemical and thermal performance are the primary focus of the WRSF closure design, other closure considerations—such as wildlife interaction (e.g., caribou movement, injury risk associated with coarse waste rock), long-term physical stability, and surface drainage control—are not clearly addressed in the ICRP. These factors can influence long-term environmental performance and land use compatibility.

Recommendation:

(R-47) CIRNAC recommends that AEM should clarify how non-geochemical closure considerations (including wildlife interaction, surface roughness, and access control) have been addressed in the WRSF closure design, or identify where additional mitigation or monitoring may be required.

Agnico Eagle Response:

A review and inspection by a licensed engineer provides the final approval whether the WRSF meets the physical stability closure criteria or not. Agnico Eagle will resolve engineer review and inspection non-conformities until the WRSF does meet physical stability closure criteria. As described in Section 4.2 of the ICRP, the ICRP also considers the safe end land use of the site, whether it is use of the land by wildlife (e.g., caribou) or traditional land uses (e.g., hunting, foraging). Monitoring of the closed Mine site during the Post-closure phase is also included in the Closure Post-Closure Monitoring Plan.

CIRNAC Reply:

AEM has not provided the requested information. Instead, their response addresses topics that were not included in the request. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

48. Viability of contingency measures for underperforming thermal covers on WRSFs

Comment:

Section 6.5.7 identifies additional placement of NPAG/NML material to increase cover thickness as a contingency if thermal performance is not as predicted. However, the ICRP does not clearly assess whether this measure is practically feasible post-closure, given material availability, access, constructability, and disturbance implications.

**Recommendation:**

(R-48) CIRNAC recommends that AEM should confirm whether post-closure placement of additional cover material is a viable and realistic contingency, and to describe the conditions under which this measure would be implemented, including logistical and environmental constraints.

Agnico Eagle Response:

Agnico Eagle has assessed the chemical stability of the WRSFs given the current cover concept and concluded that chemical stability will be achieved and maintained post-closure. Please refer to CIRNAC-44 for further information regarding chemical stability.

Furthermore, studies are ongoing to determine whether contingent placement of NPAG to thicken the cover is necessary or not. As this submission is an interim closure plan, this mitigation will be updated in the final closure plan.

CIRNAC Reply:

Based on their ongoing studies to determine whether contingent placement of NPAG to thicken the cover is necessary or not, AEM has acknowledged that placement of additional cover material may be a viable and necessary contingency. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

49. Inconsistent modelling horizons between source terms and water quality predictions

Comment:

The WQLBM indicates that WRSF source terms are modelled through to approximately 2170, including the period when the active layer is predicted to penetrate through the thermal covers and reach depths of up to ~6 m. However, the reported water quality prediction plots and tables do not clearly extend over the same timeframe, and it is therefore not evident that the water quality implications of late-time active layer penetration are fully evaluated and presented. This disconnect creates uncertainty as to whether incremental loading associated with deeper thaw has been translated into predicted concentrations up to 2170.

Recommendation:

(R-49) CIRNAC recommends that AEM should extend water quality prediction results over the full source term modelling horizon (to at least 2170), or clearly demonstrate how late-time source term changes associated with deeper active layer penetration are reflected in the reported water quality outcomes and closure conclusions.

**Agnico Eagle Response:**

Based on recent climate science and understanding, any modelling post year 2100 are highly speculative and not as reliable as a means of studying the effects of climate change. Regardless, as stated in Section 4.2.2 in Appendix C of Appendix 6-E, the net effect is an annual increase in loadings of 0.17%. The overall effect is negligible, therefore Agnico Eagle does not agree with extending the modelling horizon to 2170.

CIRNAC Reply:

AEM has not provided the requested information. The comment was not specific to climate change effects. Instead, as indicated in the comment, CIRNAC recommended that water quality predictions be aligned with the duration of geochemical source term predictions. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

50. Underground disposal of equipment, demolition debris, and contaminated soils**Comment:**

Disposal of machinery, equipment, demolition debris, and contaminated soils within deep underground permafrost zones is expected to present a low risk of contaminant migration, given the thermal stability and limited hydraulic connectivity at depth. However, the ICRP does not clearly define disposal depth criteria or formally constrain underground disposal to zones where long-term permafrost conditions can be confidently relied upon. In addition, it is not clear whether this disposal approach was explicitly included in the originally approved closure concept or whether its acceptability has been confirmed with regulators and stakeholders.

Recommendation:

(R-50) CIRNAC recommends that AEM should only dispose of equipment, demolition waste, and contaminated soils in underground locations that are proven to be stable permafrost zones, with clear criteria defining acceptable disposal locations. AEM should also confirm that the practice is consistent with prior approvals and provide documentation of any regulatory or stakeholder concurrence.

Agnico Eagle Response:

Agnico Eagle confirms that:

- disposal of equipment is consistent with the prior Whale Tail Pit ICRP (Section 5.2.15 of December 2019 Whale Tail ICRP).
- disposal of wastes is consistent with the prior closure options as per the Meadowbank ICRP (Section 5.2.8.3 of May 2019 Meadowbank ICRP).



Disposal of contaminated soils was not in previous ICRPs; however, is not a new concept to mining in Nunavut. For example, the Lupin Mine Final Closure and Reclamation Plan includes disposal of contaminated soils in the underground (Section 4.3.2.4 of Lupin Mines Incorporated Final Closure and Reclamation Plan, Rev1, August 2020).

To address CIRNAC's comment regarding the location in the underground, as outlined in Section 6.4.3.3 of the Meadowbank Complex ICRP: "Contaminated soils, waste tires and other inert waste material such as pipes, culverts and sea cans could also be placed underground in sectors within permafrost ready for backfill."

CIRNAC Reply:

AEM has not provided the requested information. Specifically, they have not provided proof of stakeholder concurrence on the revised approach. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

51. Cyanide-impacted residues and demolition considerations

Comment:

Experience at other northern mine closures has shown that cyanide-impacted dust and residues within mills and process equipment can complicate demolition and waste handling. While the ICRP describes general cleaning prior to demolition, it does not explicitly assess whether cyanide-impacted residues are expected at Meadowbank or how such materials would be managed prior to underground disposal or landfill placement.

Recommendation:

(R-51) CIRNAC recommends that AEM should assess the potential for cyanide-impacted residues or dust within mill and process equipment and, if present, describe the required abatement, verification sampling, and approved disposal pathways.

Agnico Eagle Response:

Section 6.8.3.1 of the Meadowbank Complex ICRP describes general infrastructure and decommissioning, stating the following:

Decommissioning of the mill will require emptying of tanks, purging the process piping and chemical lines, emptying the glycol network, and emptying the various fuel, oil, and grease tanks. All structural elements and fixed equipment will be cleaned with water to remove and recover as much as possible all the fine asbestos dust spread out across the mill. The procedures for decontamination and management of demolition waste will continue to be developed on site during the remaining part of operations. Hazardous material generated during demolition will be managed in closure following the same practices as during operations.



Though cyanide management is not explicitly stated with regards to infrastructure decommissioning, a similar approach (e.g., washing) to that used to manage asbestos could be used. Other methods will continue to be developed as part of operations. Methods developed will align with the Meadowbank and Whale Tail Hazardous Material Management Plan, which details safe handling of cyanide (Section 4 and Appendix B.1). Areas in the immediate vicinity of infrastructure associated with cyanide will be identified and managed as part of environmental assessment work (refer to Section 9.2 and 9.3, and Appendix 6-C of the ICRP).

CIRNAC Reply:

AEM's response indicates that the closure plan has not considered the potential for cyanide contamination in mill equipment or infrastructure that is destined for disposal. Given the Department's experience with cyanide challenges associated with the closure of the former mill at the Colomac Mine, CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

52. Disposal pathways and acceptance criteria for demolition waste**Comment:**

The ICRP identifies multiple potential disposal options for non-hazardous demolition waste (on-site landfill, underground disposal, off-site removal), but does not clearly specify which waste streams will be directed to which disposal locations, nor the acceptance criteria for each. This lack of clarity limits CIRNAC's ability to confirm that disposal practices are appropriate and consistent with closure objectives.

Recommendation:

(R-52) CIRNAC recommends that AEM should prepare a waste disposition plan that identifies major waste streams, specifies disposal locations (including confirmation of permafrost-zone disposal where applicable), and documents acceptance criteria, volume estimates, and any required approvals.

Agnico Eagle Response:

As outlined in Appendix 6-G of the Meadowbank Complex ICRP (December 2025), Agnico Eagle is currently working on its waste management strategies for closure.

Appendix 6-G (Table 1 specifically) aimed to clarify the acceptable and unacceptable types of solid waste to be placed in the Meadowbank and Whale Tail landfills, as well as alternative disposal options for waste generated during the remaining period of operation and in closure. Appendix B (of Appendix 6-G) provides a detailed produce for decommissioning equipment of disposal in a landfill.



Further details on disposal of demolition waste will be provided through the FCRP; however, Agnico Eagle has already advanced some of the recommendations of CIRNAC, as outlined in Appendix 6-G.

CIRNAC Reply:

The level of detail currently available is acceptable for an ICRP. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

53. Confirmation of residual acid rock drainage/metal leaching (ARD/ML) and metals exposure across disturbed footprints**Comment:**

The Human Health and Ecological Risk Assessment (HHERA) relies heavily on the conclusion that no soil persistent organic pollutant contaminants (POPCs) are present post-closure, leading to the determination that direct contact with soil, dust inhalation, and ingestion of plants and wild game are incomplete exposure pathways. However, this conclusion appears to depend on how “soil” is defined and screened, given that extensive disturbed footprints (waste rock pads, ore handling areas, roads, airstrip, mill areas) are constructed of mine materials that are known to have elevated metals concentrations relative to generic soil quality guidelines. The HHERA does not clearly demonstrate how these mine-material surfaces were classified, screened, or excluded from soil POPC identification, nor how ARD residuals were ruled out across these large areas.

Recommendation:

(R-53) CIRNAC recommends that AEM should clearly define how disturbed mine-material surfaces (e.g., waste rock pads, ore pads, haul roads, mill foundations) were treated in the HHERA soil screening, and to provide closure confirmation criteria demonstrating that these surfaces are non-potentially acid generating (NPAG) and do not represent ongoing metals exposure pathways to human or ecological receptors.

Agnico Eagle Response:

Section 5.1 of the HHERA (Appendix 6-D of the ICRP) describes the approach in the HHERA for predicting soil quality in closure. The HHERA soil screening focused on human health receptor locations as identified in the IQ Baseline Study, as well as locations of soil and vegetation monitoring from the Wildlife and Country Foods Screening Level Risk Assessment. These locations are appropriate for evaluating the exposure pathways of direct contact with soil and ingestion of plants and wild game.



As described in the ICRP, disturbed areas such as waste rock pads, ore handling areas, roads, airstrip, mill areas will be reclaimed by removing and dismantling infrastructure. Footprints of these areas will be evaluated as part of the ESA and managed accordingly, with contaminated soil reporting to the in-pit TSF or underground workings. Routine human or ecological contact with these surfaces is not anticipated. A Closure Investigation Work Plan (Appendix 6-C of the ICRP) was developed to evaluate any infrastructure that has not been remediated upon closure and to identify areas of the mines and soil volumes requiring remediation (i.e., where soils do not meet the soil quality remediation objectives).

CIRNAC Reply:

Based on AEM's response, it is CIRNAC's understanding that the HHERA did not consider the pathways associated with exposures to metals from disturbed areas (i.e., locations where mine rock has been used to construct infrastructure such as roads and lay-down areas that will remain on site after closure). On that basis, there is a potential that the risks assessed by the HHERA are under-predicted. CIRNAC requires further clarification on the issue to perform a technical analysis of AEM's proposed closure concept.

54.Criteria for identifying “metal contamination” and adequacy of non-potentially acid generating/non-metal leaching (NPAG/NML) cover material

Comment:

The ICRP states that, where metal contamination is identified on ore pads, affected areas will be covered with NPAG/NML waste rock. The HHERA, however, concludes that no soil POPCs exist, raising ambiguity as to what criteria would trigger this mitigation and how “metal contamination” is defined in closure decision-making. In addition, while NPAG/NML material may be geochemically stable, it may still contain elevated metals concentrations that could be relevant for direct contact or dust exposure.

Recommendation:

(R-54) CIRNAC recommends that AEM should define the analytical criteria and decision rules used to classify areas as “metal contaminated” at closure, and to demonstrate that NPAG/NML cover material used for mitigation does not itself represent a metals exposure pathway under post-closure land use assumptions.

Agnico Eagle Response:

Agnico Eagle's site-specific soil quality reclamation objectives (SQROs) define the thresholds at which soils are deemed contaminated and which require remediation during closure. NPAG rock has been used as part of closure cover on the Portage Waste Rock Storage Facility (WRSF). Seepage from the Portage WRSF is monitored through the groundwater monitoring plan (e.g., sites along NP-2 Lake). Monitoring to date has not



detected seepage water from the Portage Rock Storage Facility to NP-2 Lake. Monitoring of seepage will continue in closure (as per the Closure/Post-Closure Monitoring Plan) at station ST-16, to confirm exposure to the environment has been mitigated.

CIRNAC Reply:

AEM's response does not address the request. Specifically, they do not demonstrate that NPAG/NML surfaces do not represent a metals exposure pathway. CIRNAC notes that it is very likely that the rock used for infrastructure construction, while not "soil", will have elevated metal concentrations even when it is classified as NPAG/NML. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

55. Exposure scenario assumptions in the HHERA**Comment:**

The HHERA evaluates a single human receptor: an adult member of the public, with exposure assumed to occur for a limited duration during post-closure, and concludes that risks from water ingestion and fish consumption are negligible. Other exposure pathways (soil contact, plant and wild game consumption) were screened out due to the absence of soil POPCs. Compared to risk assessments at other northern legacy sites, the exposure duration and receptor selection are relatively limited, and the HHERA does not clearly demonstrate that Inuit land use scenarios involving longer seasonal presence, family groups, or off-site consumption of harvested country foods were explicitly evaluated and agreed upon.

Recommendation:

(R-55) CIRNAC recommends that AEM should confirm that Inuit organizations support the exposure scenarios used in the HHERA, including receptor selection, exposure duration, and assumptions regarding harvesting and off-site consumption of country foods, and to document how Inuit Qaujimajatuqangit informed those assumptions.

Agnico Eagle Response:

Agnico Eagle acknowledges the importance of Inuit Qaujimajatuqangit. The assessment incorporated Inuit traditional knowledge and community input gathered through multiple engagement processes, including the 2016 FEIS, the 2018 FEIS Addenda, and the 2019 engagement activities. Building on this foundation, Agnico Eagle conducted additional closure focused engagement in 2024, including public meetings, focus groups, focused meetings and site visits. These sessions provided Inuit communities and organizations meaningful opportunities to advise on receptor locations, exposure durations, and assumptions related to harvesting practices and the offsite consumption of country foods.



The information shared through these engagements directly informed the HHERA which had been reviewed and approved by Intervenors during the 2016 FEIS and 2018 FEIS Addenda; a summary table is presented in Appendix 6-D, Section 3.0, Table 1 of the HHERA.

CIRNAC Reply:

AEM's response indicates that community members advised on the design of the risk assessment assumptions. AEM should provide confirmation from the affected community groups that the assumptions used in the risk assessment align with their current and future potential land use practices. Specifically, confirmation should be provided that the exposure scenarios are reflective of Inuit land use. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

56. Apparent absence of soil POPCs despite widespread mine disturbance

Comment:

Based on the HHERA, the conclusion that no soil POPCs are present is technically defensible if soil is defined as natural surficial material and mine wastes are intentionally excluded. However, the HHERA does not make this distinction explicit, which creates confusion given the known presence of elevated metals in mine-derived materials documented in Environmental Site Assessments (ESAs) and other site studies.

Recommendation:

(R-56) CIRNAC recommends that AEM should explicitly state whether mine wastes and disturbed mine-material surfaces were excluded from soil POPC screening in the HHERA, and to justify that exclusion in the context of post-closure land use and exposure assumptions.

Agnico Eagle Response:

See response to CIRNAC-53 for further information on soil screening in the HHERA, and the application of the Closure Investigation Work Plan to identify soils requiring further remediation upon closure. The exclusion of mine wastes and disturbed mine-material surfaces from the soil screening in the HHERA is appropriate under post-closure land-use assumptions, as these mine-derived materials will be managed through engineered closure measures (e.g., covers, encapsulation, and access controls), supported by materials-specific geochemical and performance assessments. As a result, routine human or ecological contact with these surfaces is not anticipated.

**CIRNAC Reply:**

AEM's response indicates that mine wastes and disturbed mine material surfaces were excluded from the soil screening in the HHERA. Given the extensive footprint of disturbed mine material surfaces that will remain after closure, further justification for this decision is required. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

57. Chromium in sediments at Third Portage Lake**Comment:**

The HHERA acknowledges that chromium concentrations in sediments at Third Portage Lake exceeded triggers in 2023, notes that concentrations appear to have peaked in 2017 and declined since, and concludes that adverse effects to benthic communities and fish are unlikely. While this interpretation may be reasonable, the closure implications of this residual contamination are not clearly articulated, particularly in terms of whether ongoing management, monitoring, or formal acceptance of residual effects is intended.

Recommendation:

(R-57) CIRNAC recommends that AEM should include a clear closure-position statement for chromium-impacted sediments at Third Portage Lake, identifying whether active management, enhanced monitoring, or acceptance with justification is proposed, and how this aligns with long-term closure objectives and liabilities.

Agnico Eagle Response:

Elevated chromium concentrations have been observed in Third Portage Lake (TPE) sediments since 2009 (Appendix D1, 2024 CREMP Report). These exceedances triggered a targeted assessment program to evaluate sediment chromium bioavailability and potential effects within the CREMP. Follow-up sampling in 2014, along with bioavailability and toxicity testing completed in 2015, 2018, and 2019 (Appendix D1, 2024 CREMP Report), demonstrated that chromium concentrations at TPE are unlikely to adversely affect the benthic invertebrate community. This conclusion is supported by toxicity test results for *Chironomus dilutus* and *Hyaella azteca*, as well as sequential extraction analyses of sediment (Appendix D1, 2024 CREMP Report).

Sediment core and grab samples collected since 2013 have been variable however, concentrations have been declining since 2017 and remain below applicable CCME sediment quality guidelines (CCME, 1999). Based on this evidence, no active remediation is warranted at this time. Agnico Eagle will continue monitoring chromium trends at TPE to confirm ongoing improvement and ensure continued protection of aquatic life to meet closure objectives.

**References:**

Azimuth Consulting Group Inc. 2025. Meadowbank Complex 2024 Annual Report Appendix 26 - Meadowbank and Whale Tail 2024 CREMP Report.

Canadian Council of Ministers of the Environment. 1999. Canadian Sediment Quality Guidelines for the Protection of Aquatic Life – Chromium.

CIRNAC Reply:

AEM's closure plan does not present the rationale that is provided in the response. To ensure traceability of decision-making, it is critical that all potential contaminant sources, including elevated chromium in TPE sediments, are explicitly addressed in the closure plan, even in situations where "risk management" is selected as the preferred approach. CIRNAC recommends that the ICRP be modified accordingly.

58. Interim nature of Closure and Post-Closure Compliance Monitoring Plan (CPCMP) and Adaptive Reduction Framework

Comment:

The ICRP includes a CPCMP and an Adaptive Reduction Framework that are generally appropriate at a conceptual level, but both are being reviewed for the first time under this ICRP and are not yet developed to the level needed to support closure-critical decisions (e.g., reconnection, discharge, security reduction). The documents should be treated as interim and will require substantive refinement as AEM advances toward the final Closure and Reclamation Plan (CRP).

Recommendation:

(R-58) CIRNAC recommends that AEM should explicitly state that the CPCMP/Adaptive Reduction Framework are interim and to commit to a revised, CRP-ready version that includes full decision logic, evidence thresholds, and linkages to closure acceptance criteria.

Agnico Eagle Response:

Agnico Eagle confirms that the current CPCMP and its Adaptive Reduction Framework are interim documents intended to guide monitoring during the transition to closure. Also see responses to ECCC-01, ECCC-04, and ECCC-05.

The revised CPCMP will be fully aligned with, and submitted alongside, the FCRP. Consistent with Water Licence requirements for ongoing review and revision, Agnico Eagle will update the CPCMP and provide further details within the FCRP.

CIRNAC Reply:

The response is adequate for the current ICRP. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.



59. Technical justification for any monitoring reductions

Comment:

Table 4.2-5 of the CPCMP lists proposed decommissioning dates for several monitoring locations, but the document does not provide the site-specific technical justification required to support removal of existing stations or parameters.

Recommendation:

(R-59) CIRNAC recommends that AEM should provide a comprehensive “monitoring change log” that lists every proposed reduction (station/parameter/frequency), the specific performance evidence required to justify the reduction, and a conservative default that no reductions occur unless the justification is met.

Agnico Eagle Response:

In the CPCMP, Agnico Eagle proposed a process to reduce monitoring of parameters, stations, frequency, or all when criteria are met. As noted in response to ECCC-05, rationale for reduction in monitoring will be provided. No reductions will occur unless all evidence criteria are satisfied and approval from the NWB is obtained. The default monitoring station/parameter/frequency remains as outlined in Table 4.2-5 and Table 4.2-8 baseline frequencies (CPCMP 2025).

Future changes will be captured in a tracking sheet (e.g., change log) to show continuity and rationale for reduced monitoring frequencies after the new reduction has been approved by the NWB.

CIRNAC Reply:

The response is adequate for the current ICRP. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

60. Linkages to current operational/Water Licence monitoring

Comment:

The CPCMP references alignment with Water Licence station naming and indicates that monitoring during closure is expected to remain closely aligned with operations until a Closure Water Licence is in place. However, it does not clearly provide a side-by-side summary of what changes relative to the current operational plan (added/removed stations, parameters, frequency), which makes it difficult to evaluate adequacy and identify premature reductions.



Recommendation:

(R-60) CIRNAC recommends that AEM should provide linkages from the current operational/Water Licence monitoring program to the proposed closure/post-closure program, explicitly summarizing all additions and reductions (stations, parameters, frequency) with rationale.

Agnico Eagle Response:

As noted in response to CIRNAC-59, the default monitoring station/parameter/frequency remains as outlined in Table 4.2-5 and Table 4.2-8 baseline frequencies (CPCMP 2025); note these are the stations as currently listed in the Meadowbank and Whale Tail Type A Water licenses. The CPCMP will retain the core operational monitoring stations and parameters to ensure continuity, incorporate additional closure specific stations and analytes needed to verify performance against closure criteria (e.g., pit lake stability, seepage control), and phase out operational only elements as infrastructure is decommissioned and associated risk pathways are removed. Monitoring frequencies will be highest during early closure and will decrease as stable, protective conditions are demonstrated.

A detailed monitoring plan—defining stations, parameters, and sampling frequencies—will be submitted with the Final Closure and Reclamation Plan. As progressive reclamation is ongoing, it is premature to finalize the full set of additions and reductions at this stage.

CIRNAC Reply:

The response is adequate for the current ICRP. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

61. Adaptive Reduction Framework Decision Rules

Comment:

The CPCMP describes an Adaptive Reduction Framework intended to guide reductions in parameters, frequency, and stations, but it does not yet define decision rules (minimum dataset length, seasonality requirements, trend/equivalence tests, treatment of variability, and acceptable false-negative risk). Without that, the removal of monitoring scope becomes a subjective decision that may not be accompanied by appropriate technical justification.

Recommendation:

(R-61) CIRNAC recommends that AEM should define quantitative decision rules for adaptive reductions in monitoring, including minimum years/seasons of data, objective statistical tests (trend and equivalence), and “no-reduction” constraints for high-consequence endpoints (pit lakes, Collection Pond 23 discharge, Tailings Storage Facility (TSF) seepage, Waster Rock Storage Facility (WRSF) contact water).



Agnico Eagle Response:

Decision rules for monitoring reductions have been proposed in the first CPCMP (sections within the CPCMP are noted):

- Water:
 - o Removal of a parameter (Section 4.4.1.1)
 - o Reduction in frequency at a station (Section 4.4.1.2)
 - o Removal of a station (Section 4.4.2)
- Geotechnical
 - o Reduction in frequency (Section 4.4.3)
 - o Removal of instrumentation (Section 4.4.4)
- Reduction in TSF monitoring (water and geotechnical) (Section 4.4.5)
- Reduction in soil contaminant monitoring (Section 4.4.6)

No reductions will occur unless all evidence criteria are satisfied and regulatory approval from the NWB is obtained (Section 4.4.7 of the CPCMP). Further details will be provided in the FCRP.

CIRNAC Reply:

The response is adequate for the current ICRP. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

62. Seepage monitoring needs explicit trigger-response linkages

Comment:

The CPCMP describes closure seepage surveys (e.g., twice per year) and ties station naming to the Water Licence, which is a reasonable baseline. However, it does not clearly define what constitutes a “material change” in seep conditions and how seep results trigger escalation (additional sampling, source attribution, mitigation, or changes to closure sequencing such as delaying reconnection).

Recommendation:

(R-62) CIRNAC recommends that AEM should link seepage monitoring to a decision tree with defined triggers and actions, including escalation thresholds and how seep outcomes constrain other closure decisions (e.g., reconnection/discharge timing).

Agnico Eagle Response:

Agnico Eagle is developing TARPs, communication processes and decision-making processes to be included into the FCRP, or its appendices, and subject to NWB review and approval. TARPs will be updated adaptively as new performance data become available. This approach ensures seepage monitoring directly informs timely actions and transparently



constrains key decisions, including reconnection and discharge timing, until performance criteria are met.

CIRNAC Reply:

The response is adequate for the current ICRP. However, the status will need to be revisited upon submission of a Final Closure and Reclamation Plan (FCRP) for approval.

63. Workshop to advance the monitoring/reduction framework

Comment:

Given that the CPCMP and Adaptive Reduction Framework are foundational to post-closure decision-making and future reductions in monitoring burden, early alignment on the decision logic, evidence thresholds, and reduction principles is important before AEM advances to the CRP.

Recommendation:

(R-63) CIRNAC recommends that AEM should convene a workshop with key reviewers to walk through the CPCMP network, proposed reductions, adaptive decision rules, and how monitoring supports closure acceptance and security release decisions, and to incorporate outcomes into the CRP-ready CPCMP.

Agnico Eagle Response:

Agnico Eagle acknowledges CIRNAC's recommendation and will evaluate the need for a workshop with key reviewers as part of developing the FCRP.

CIRNAC Reply:

AEM has not committed to the recommendation. The purpose of the recommendation is to facilitate reaching consensus on the proposed approach.

64. Proposed Interim Closure and Reclamation Plan (ICRP) scope changes

Comment:

The revised ICRP includes an updated closure and reclamation security estimate that appears to assume implementation of all revised closure concepts including, for example the revised Tailings Storage Facility (TSF) cover concept and revised water management concept. These revisions represent material scope changes that have not yet been approved. Updating the security estimate on the assumption that all proposed changes are accepted is premature and risks embedding unapproved scope into the secured liability.



Recommendation:

(R-64) CIRNAC recommends that AEM should clearly identify which components of the revised security estimate are based on approved closure concepts versus proposed (unapproved) revisions, and to explicitly flag any portions of the estimate that rely on assumptions that remain subject to regulatory review and approval.

Agnico Eagle Response:

As presented in Table 8.3-3 of the ICRP, Meadowbank direct costs with larger changes based on activities of the ICRP are related to two components 1) Tailings Storage Facility; 2) Surface and Groundwater Management.

Table 8.3-3: Meadowbank RECLAIM Version 7.0 Comparison

Item	Component	Current Cost	2019 Cost	Difference
Open Pit	Portage	\$75,240	\$3,240	\$72,000
	Goose	\$73,080	\$1,080	\$72,000
	Vault	\$1,080	\$1,080	\$0
	Phaser	\$1,080	\$1,080	\$0
Underground Mine	-	\$0	-	\$0
Tailings Facility	-	\$32,121,068	\$38,680,308	-\$6,559,240
Rock Pile	Portage	\$2,707,534	\$1,378,767	\$1,328,767
	Vault	\$30,000	\$30,000	\$0
Buildings and Equipment	Meadowbank	\$8,121,236	\$8,029,508	\$91,728
	Baker Lake	\$1,685,266	\$1,660,670	\$24,596
	AWAR	\$749,930	\$993,078	-\$243,148
Chemicals and Contaminated Soil Management	-	\$1,316,981	\$1,316,981	\$0
Surface and Groundwater Management	-	\$25,409,069	\$7,997,222	\$17,411,847
Interim Care and	-	\$847,800	\$847,800	\$0

As presented in Table 8.3-4 of the ICRP, Whale Tail direct costs with larger changes based on activities of the ICRP are related to Surface and Groundwater Management.

**Table 8.3-4: Whale Tail RECLAIM Version 7.0 Comparison**

Item	Component Name	Current Cost	2019 Cost	Difference
Capital Costs				
Open Pit WT	-	\$35,345	\$35,345	\$0
Open Pit IVR	-	\$7,550,316	\$8,401,400	-\$851,084
Underground Mine	-	\$775,689	\$786,699	-\$11,010
Tailings Facility	-	\$0	\$0	\$0
Rock Pile WT	-	\$6,129,757	\$5,932,400	\$197,357
Rock Pile IVR	-	\$2,921,227	\$3,441,000	-\$519,773
Buildings and Equipment	-	\$3,774,657	\$3,774,657	\$0
Chemicals and Contaminated Soil Management	-	\$899,779	\$899,779	\$0
Surface and Groundwater Management	-	\$22,750,756	\$6,495,673	\$16,255,083
Interim Care and Maintenance	-	\$947,781	\$947,781	\$0

CIRNAC Reply:

AEM has not provided the requested information. Specifically, they have not differentiated between approved and proposed closure strategies. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

65. Security release framework**Comment:**

The ICRP and Appendix 6J indicate an expectation that a portion of reclamation security associated with the TSF would be returned following completion of closure construction. While the responsibility for defining the security release process ultimately rests with regulators and Inuit organizations, the absence of a clearly articulated framework (information requirements, timing, holdbacks, and performance confirmation) creates uncertainty for all parties and increases the risk of misaligned expectations.

Recommendation:

(R-65) CIRNAC recommends that AEM should proactively engage with regulators, CIRNAC and KivIa to collaboratively develop and document a clear framework for closure security release, including information requirements (e.g., as-built documentation, quality assurance/quality control (QA/QC) records, monitoring duration), decision criteria, sign off requirements, timing, and any holdback provisions, and to reflect that framework in future closure and security submissions.

**Agnico Eagle Response:**

Agnico Eagle feels there is a framework in place to ensure that Agnico Eagle receives a reduction in security for the work that would be progressively reclaimed. Progressive reclamation and reduction of security is normal requirement of our license and also associated policies (refer to KivIA-04 for additional details). We have listed the activities with closure as per our applications to NIRB and NWB and security was approved by all parties during the licensing phase. It is our understanding that the concept of closure was approved and that all parties knew that progressive reclamation would occur and be supported by all parties to ensure the activities at the site would reduce the activity at time of final closure. This would be the incentive for companies to achieve that. Based on this the direct and indirect costs from the security calculation, that is approved, would be reduced based on the activities highlighted in the costing, as per this case RECLAIM.

The schedule of activities was outlined in Section 10 of the ICRP, and Figure 10.2-1 and 10.2-2: Capping of the TSF will occur from 2026 to 2028. A reduction of security associated with this work was outlined in Section 8.5 and Table 8.5-1.

Based on this, Agnico Eagle has initiated discussions with NWB and will provide a framework that is aligned with the license and existing policies for future discussions.

CIRNAC Reply:

AEM has not addressed the request. CIRNAC notes that there are no defined procedures in Nunavut to administer the release of security after closure works have been implemented, whether through progressive reclamation or final closure. Consequently, there is a potential for confusion regarding expectations for release of funds after completion of closure works. Further, the response does not acknowledge that the closure concepts that were presented in the original conceptual closure plan were and continue to be subject to change. Implementing progressive reclamation based on those initial concepts is at the risk of AEM until such time that the FCRP is approved. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

66. Evidence requirements to support security reduction**Comment:**

The evidence that the ICRP indicates will be used to support security reductions (e.g., photographs, engineering verification, inspection sign-off) that are high-level and do not clearly define what constitutes acceptable performance for large, high-consequence closure works such as the TSF and long-term water management infrastructure.

**Recommendation:**

(R-66) CIRNAC recommends that AEM should develop component-specific acceptance and evidence packages that define measurable performance criteria, minimum monitoring or observation periods, and documentation requirements that must be met before security associated with each major closure component can be reduced.

Agnico Eagle Response:

Agnico Eagle will be placing rock on the closed north and south cell TIA. The cost is directly related to the volume of rock, and the time and materials needed to place the rock. This will be the amount we will request for reduction of security in 2028. See KivIA-04 for additional details.

The monitoring will continue as per the ICRP. The monitoring will show, as per the criteria already noted in the ICRP, that the facility will be chemically and physically stable and will validate our Water Quality predictions.

The information has been provided to CIRNAC since November 2024.

CIRNAC Reply:

AEM has not addressed the request. Specifically, they do not provide component-specific acceptance and evidence packages that define measurable performance criteria, minimum monitoring or observation periods and documentation requirements. Regarding AEM's assertion that the information has been provided to CIRNAC since November since 2024, that assertion is incorrect. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.

67. Escalation, inflation, and timing of security updates**Comment:**

The current security estimate relies on unit rates that are approximately seven years old. As evidenced by recent security estimate updates at other AEM mines in Nunavut (e.g., Meliadine and Doris), the use of dated unit rates has the potential to underestimate reclamation securities by more than 30%. Delaying adjustment of unit rates until all closure scope decisions are finalized risks under-securing the project during an interim period when closure liabilities remain significant.

Recommendation:

(R-67) CIRNAC recommends that AEM should immediately update the closure and reclamation security estimate to reflect current unit rates and inflation, independent of



unresolved ICRP scope changes, and to commit to a subsequent update once the revised ICRP scope is finalized and the updated RECLAIM 8 framework has come into effect.

Agnico Eagle Response:

Agnico Eagle will not use RECLAIM 8 as this version is not complete, plus there needs to be a policy discussion as well, prior to any use or publication. It is important proper consultation continues with all parties to ensure that all concerns have been addressed and properly communicated. Agnico Eagle has used RECLAIM 7 for the updated costs that have been provided in the ICRP.

Through CIRNACs email request for a “final” RECLAIM 8 review, Agnico Eagle completed a preliminary review of recent updates made and filed comments on April 17. Again, Agnico Eagle is concerned with the lack of clarity and consultation on RECLAM 8. Agnico Eagle feels strongly that the Reclaim 8 version is not ready for publication.

CIRNAC Reply:

CIRNAC is working with AEM and KivIA to update the Quantum of Security Estimate for the Meadowbank Complex