



August 14, 2026

Abid Jan
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0B 1J0

Re: Response to Second Round Comments on Meadowbank Complex Interim Closure and Reclamation Plan

Dear Mr. Jan,

On May 15, 2026, Agnico Eagle submitted a response package to the Nunavut Water Board (NWB) addressing comments on the Meadowbank Complex Interim Closure and Reclamation Plan (ICRP). The NWB distributed the package to parties on May 19, 2026, and requested confirmation as to whether Agnico Eagle's responses adequately addressed the comments received.

On July 22, 2026, the NWB distributed the confirmations received from CIRNAC and ECCC regarding Agnico Eagle's responses and requested a further response from Agnico Eagle. In its July 22 correspondence, the NWB stated *"The NWB recognizes there are information gaps and differences in position between the parties."*

After reviewing the parties' responses, Agnico Eagle agrees with the NWB's observations that differences in opinion may remain. However, Agnico Eagle stresses that sufficient technical evidence has been provided, including evidence reviewed by qualified geotechnical experts, to support a decision on this file.

We again emphasize that we are confident in the technical ability of the NWB and its staff to evaluate the evidence that Agnico Eagle has presented.

For the second round of responses, Agnico Eagle has provided a table of the comment and our response to each comment. The previous comments and responses have been removed for this document to reduce repetition.

Agnico Eagle encourages the Board to provide guidance on the resolution of the file.

Regards,

Colleen Prather
colleen.prather@agnicoeagle.com
Superintendent, Permitting & Regulatory Affairs

Table of Contents

Table of Contents	2
SECOND ROUND OF COMMENT RESPONSES	3
KIVALLIQ INUIT ASSOCIATION (KivIA)	13
CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC)	14
ENVIRONMENT AND CLIMATE CHANGE CANADA (ECCC)	15
FISHERIES AND OCEANS CANADA (DFO)	16

SECOND ROUND OF COMMENT RESPONSES

Table 1: Agnico Eagle Response to Second Round Comments

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-01	TSF Closure	Closure sequencing versus potential life-of-mine extension	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.	Sufficient response and evidence have been provided. 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.
CIRNAC-02	TSF Closure	Treatment of the TSF closure appendix as “final” prior to a Final Closure and Reclamation Plan (FCRP)	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.	Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-03	CRP Process	Aggressive review timelines	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.	Sufficient response has been provided; no further response or information is required at this time. To note, Agnico Eagle disagrees with CIRNAC’s comment suggesting ‘others’ have made multiple requests for technical information. Yes, technical comments were raised and evidence and responses were provided. ‘Others’ have not commented on a aggressive review timeline.
CIRNAC-04	CRP Process	Engagement claims and incorporation of feedback	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.	Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-05	Revegetation	Revegetation strategy	AEM’s response does not relate to the request.	Sufficient response has been provided; no further response or information is required at this time. Again, revegetation efforts have been clearly documented in 2019 Whale Tail ICRP (natural revegetation), through the Project Certificate, and annual reporting allowing ample opportunity for other parties to comment on, should they choose.
CIRNAC-06	CRP Process	Tracking of changes from previously approved closure concepts	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.	Noted.
CIRNAC-07	TSF Closure	Change to the approved Tailings Storage Facility (TSF) design basis	AEM’s response does not relate to the request.	Sufficient response has been provided; no further response or information is required at this time. To note, it is not Agnico Eagle’s responsibility to demonstrate whether the KivIA agrees with the tailings cover approach, rather it is the NWB process itself that informs whether reviewing parties agree or not. Note, the KivIA had no additional comments on the review of the ICRP.

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-08	TSF Closure	TSF closure strategy is not ready to be treated as “final”	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.	Sufficient response has been provided, but additional information is also provided below in support of the original response. Agnico Eagle disagrees with CIRNAC’s assessment of the TSF in context of the wider global contaminant transport model. As described in Appendix 6-E of the application, once it is covered, the Meadowbank TSF will be an isolated system. Runoff and infiltration flow will be directed towards Collection Pond 23 and then directed out to Third Portage Lake. While all water quality modelling suggests closure objectives will be achieved shortly after the cover is in place, progressive reclamation will allow Agnico Eagle to monitor the performance of the cover during operations.
CIRNAC-09	TSF Closure	Risk of advancing TSF closure ahead of integrated site-wide closure planning	Refer to the status updates for CIRNAC-02 and CIRNAC-08.	Sufficient response and evidence have been provided; no further response or information is required at this time. Again, 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.
CIRNAC-10	TSF Closure	Closure objectives and criteria are not measurable	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.	Noted.
CIRNAC-11	TSF Closure	No TSF-specific post-closure Trigger Action Response Plan (TARP)	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.	Agnico Eagle disagrees that the TSF should not be classified as final until the TARP is available for review and approval, as sufficient information has been provided; no further response or information is required at this time.
CIRNAC-12	TSF Closure	Geotechnical risks of thicker covers are not demonstrated	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.	Sufficient response and evidence have been provided; no further response or information is required at this time.
CIRNAC-13	TSF Closure	Referenced supporting studies are not provided	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.	Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-14	TSF Closure	No structured post-closure failure modes assessment	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.	Sufficient response and evidence have been provided; no further response or information is required at this time. Agnico Eagle provided the FMEA relevant information to CIRNAC on February 21, 2025 and April 3, 2025. The April 3, 2025 submission also included the Meadowbank Tailings Storage Facility Closure Plan – Failure Modes and Effects Analysis Workshop report.
CIRNAC-15	TSF Closure	Cold-regions cover performance	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.	Sufficient response and evidence has been provided. Note that this request was initially fulfilled in Agnico Eagle’s letter to KivIA and CIRNAC on April 3, 2025 titled <i>Additional Preliminary Information Request – Meadowbank Complex CRP Draft for Comment</i> .

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-16	Water Management	Rationale for strategy change	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.	Sufficient response and evidence have been provided; no further response or information is required at this time. Again, the water management strategy has not changed and therefore there is no deviation.
CIRNAC-17	Water Management	Alternatives analysis (Multiple Accounts Analysis (MAA)/options screening)	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.	Sufficient response and evidence have been provided; no further response or information is required at this time as the transfer of water to Vault Pit is approved.
CIRNAC-18	Water Management	Meromixis feasibility and verification	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.	Sufficient response and evidence have been provided; no further response or information is required at this time.
CIRNAC-19	Water Management	Meromixis failure modes and contingency planning	The request has not been addressed. Until the information is provided, permanently storing reclaim water 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.	The transfer of water to Vault Pit is approved. Agnico Eagle reiterates that Meadowbank currently has an Interim Closure and Reclamation Plan. As is typical for closure and reclamation planning, concepts are typically initially high-level approximations. As it pertains to the concept of meromixis, initial modelling indicates permanently storing contact water in Vault Pit is a viable option. Further studies and results will be provided, particularly for the Final Closure and Reclamation Plan. Therefore, sufficient response and evidence has been provided; no further response or information is required at this time.
CIRNAC-20	Water Management	Freshwater cap depth and aquatic life protection	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.	The previous response noted that the freshwater cap will meet CCME/SSWQO post-closure, indicating the water quality will as well. Sufficient response and evidence have been provided; no further response or information is required at this time. Agnico Eagle will continue with studies for the Final Closure and Reclamation Plan.
CIRNAC-21	Water Management	Regulatory acceptability of “dirty water at depth”	AEM has not provided the requested information. CIRNAC requires the requested information to perform a technical analysis of AEM’s proposed closure concept.	Again, all Parties have provided comments where they felt were needed. Whether a party chooses to comment on a subject is their discretion, not Agnico Eagle’s. Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-22	Water Management	Pipeline transfer risk and mitigation	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.	Sufficient response has been provided; no further response or information is required as the transfer of water to Vault Pit is approved.

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-23	Water Management	Portage/Goose pit re-flooding assumptions (tailings stability and water quality)	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.	Sufficient response has been provided; no further response or information is required at this time. As noted in CIRNAC-33, until the dike breach designs are finalized, detailed contaminant transport modelling cannot be completed. This is because the final dike breach design would then inform a hydrodynamic model of the mixing characteristics within the reconnected flooded pit, and therefore the predicted chemistry in the flooded pit post-closure.
CIRNAC-24	Security	Cost and liability transparency	CIRNAC is working with AEM and KivIA to update the Quantum of Security Estimate for the Meadowbank Complex.	Noted.
CIRNAC-25	Water Management	Early Implementation of Unapproved Water Management Strategy	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.	Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-26	Water Management	Potential Requirement for Nunavut Impact Review Board (NIRB) Environmental Assessment Review	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.	Again, the water management strategy has not changed and therefore there is no deviation. Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-27	Closure Objectives	Post-closure water quality criteria are not clearly defined or differentiated	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-28	Closure Objectives	Lack of a structured Trigger Action Response Plan (TARP) and reconnection decision framework	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-29	WRSF	Waste Rock Storage Facility (WRSF) wet-up and dynamic equilibrium may not be demonstrated	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.	Sufficient response and evidence has been provided; no further response or information is required.
CIRNAC-30	Water Management	Sensitivity and uncertainty analysis is insufficiently developed	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.	Sufficient response and evidence has been provided; no further response or information is required.
CIRNAC-31	In-Pit Tailings	Role of in-pit tailings as a water quality source term is unclear	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.	Sufficient response and evidence have been provided. CIRNAC's original comment requested clarification regarding "...how in-pit tailings are represented as longterm source terms in the modelling." Agnico Eagle provided the references to the applicable studies related to the model results presented in Appendix 6-E.
CIRNAC-32	Water Management	Reconnection timing is highly sensitive to arsenic predictions	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-33	Water Management	Modelling horizon does not fully capture late-time source term evolution	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.	Sufficient response and evidence have been provided; no further response or information is required. Again, these details and model updates can be completed after the dike breach design is finalized.

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-34	In-Pit Tailings	Long-term recontamination risk from in-pit tailings	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-35	In-Pit Tailings	Removal of committed rock cover over in-pit tailings	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-36	In-Pit Tailings	Tailings resuspension and physical disturbance under flooded conditions	AEM has not provided the requested information. Refer to the status update for CIRNAC34. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-37	In-Pit Tailings	Regulatory and closure consistency of changing the in-pit tailings end state	AEM has not provided the requested information. Refer to the status update for CIRNAC34 and CIRNAC-35. CIRNAC requires the requested information to perform a technical analysis of AEM's proposed closure concept.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-38	Water Management	Status and suitability of partially treated reclaim water	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-39	Water Management	Rationale for abandoning the approved treatment-and-discharge strategy	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-40	Aeration	Demonstration of in-pit treatment performance	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.	As stated previously, Agnico Eagle will provide the data in due time when they are available.
CIRNAC-41	Water Management	Status and readiness of the closure water treatment system	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-42	Water Management	Consistency with the approved ICRP	AEM has not provided the requested information, including within the response to CIRNAC39. 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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-43	WRSF	Basis for differing Waste Rock Storage Facility (WRSF) cover thicknesses (Meadowbank vs. Whale Tail)	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.	Sufficient response and evidence have been provided; no further response or information is required. Response on May 15 addressed concern.

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-44	WRSF	Active layer penetration through the thermal covers	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.	Sufficient response and evidence have been provided; no further response or information is required.
CIRNAC-45	WRSF	Availability and adequacy of detailed thermal modelling reports	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.	Sufficient response and technical evidence have been provided; no further response or information is required.
CIRNAC-46	WRSF	Progressive reclamation verification	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.	Sufficient response and evidence have been provided; no further response or information is required. To note, to suggest detailed documentation is not provided is inaccurate. Progressive reclamation activities are communicated via the annual reports; including WRSF. This information includes thermal monitoring that occurs at the Portage WRSF.
CIRNAC-47	WRSF	Consideration of non-geochemical closure factors (e.g., wildlife interaction)	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.	Agnico Eagle provided site wide reference to closure objectives, including non-geochemical closure factors, in its response to CIRNAC. More specifically, Table 6.5-1 of the ICRP includes closure objectives, criteria and actions specifically for the WRSFs.
CIRNAC-48	WRSF	Viability of contingency measures for underperforming thermal covers on WRSFs	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.	Noted.
CIRNAC-49	WRSF	Inconsistent modelling horizons between source terms and water quality predictions	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.	Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-50	General Reclamation	Underground disposal of equipment, demolition debris, and contaminated soils	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.	Sufficient response has been provided; no further response or information is required at this time. Again, all Parties have provided comments where they felt were needed. Whether a party chooses to comment on a subject is their discretion, not Agnico Eagle’s.
CIRNAC-51	General Reclamation	Cyanide-impacted residues and demolition considerations	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.	Sufficient response was clearly provided; no further response or information is required at this time.
CIRNAC-52	General Reclamation	Disposal pathways and acceptance criteria for demolition waste	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.	Noted.

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-53	HHERA	Confirmation of residual acid rock drainage/metal leaching (ARD/ML) and metals exposure across disturbed footprints	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.	Sufficient response has been provided, but additional information is also provided below in support of the original response. The HHERA did consider pathways associated with potential metals exposure. As presented in Section 1.4 (Appendix 6-D), the temporal boundaries for the HHERA include the Post-Closure phase. Post-Closure is the period immediately following closure. The period is characterized by the completion of all reclamation activities, including recontouring, soil placement, and revegetation. Ongoing monitoring and maintenance would be occurring as required. Active or passive water treatment may continue if required. Soil screening of mine-material surfaces is discussed in Section 1.2.3, which summarizes the Phase I and Phase II Environmental Site Assessment work completed by Agnico Eagle in 2023 and 2024. The results of this work were used to develop Soil Quality Remediation Objectives (Appendix 9-A) to be achieved at closure, with consideration for the protection of human health and ecological receptors in disturbed areas.
CIRNAC-54	HHERA	Criteria for identifying “metal contamination” and adequacy of non-potentially acid generating/non-metal leaching (NPAG/NML) cover material	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.	Sufficient response has been provided, but additional information is also provided below in support of the original response. Agnico Eagle recommends that CIRNAC review the Operational ARD/ML Sampling and Testing Plans submitted annually through the Annual Report process. These plans describe the sampling, testing, and monitoring requirements for all NPAG/NML materials used in site construction during the applicable reporting year and have been provided since operations commenced. For example, the most recent plan was included as Appendix 24 of the 2025 Annual Report. Agnico Eagle maintains compliance and will continue to do so in Closure and post-closure with Part D, Item 4 of the Water Licence to ensure clean material has been used for construction which states: <i>The Licensee shall use fill material for construction only from approved sources that have been demonstrated by appropriate geochemical analyses to not produce Acid Rock Drainage and to be Non-Metal Leaching, and free of contaminants.</i>
CIRNAC-55	HHERA	Exposure scenario assumptions in the HHERA	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.	Sufficient response has been provided, but additional information is also provided below in support of the original response. To note, the evaluation nodes/areas were based on results from engagement (e.g., location of cabins, traditional use areas). In addition, engagement with communities will continue to occur and be incorporated into future versions of the ICRP with opportunities to revisit closure assumptions on submission of a Final Closure and Reclamation Plan (FCRP).

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
CIRNAC-56	HHERA	Apparent absence of soil POPCs despite widespread mine disturbance	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.	While a sufficient response and evidence have been provided; additional information to support the comment is included in response to CIRNAC-53.
CIRNAC-57	HHERA	Chromium in sediments at Third Portage Lake	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.	The level of detail currently available is acceptable for an ICRP. Chromium continues to be monitored in TPL sediments within the AEMP. Agnico has committed to continuing monitoring within the CREMP risk management framework from late operations into closure and post-closure detailed within the CPCMP.
CIRNAC-58	CPCMP	Interim nature of Closure and Post-Closure Compliance Monitoring Plan (CPCMP) and Adaptive Reduction Framework	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.	Noted.
CIRNAC-59	CPCMP	Technical justification for any monitoring reductions	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.	Noted.
CIRNAC-60	CPCMP	Linkages to current operational/Water Licence monitoring	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.	Noted.
CIRNAC-61	CPCMP	Adaptive Reduction Framework Decision Rules	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.	Noted.
CIRNAC-62	CPCMP	Seepage monitoring needs explicit trigger-response linkages	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.	Noted.
CIRNAC-63	CPCMP	Workshop to advance the monitoring/reduction framework	AEM has not committed to the recommendation. The purpose of the recommendation is to facilitate reaching consensus on the proposed approach.	Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-64	Security	Proposed Interim Closure and Reclamation Plan (ICRP) scope changes	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.	Sufficient response has been provided; no further response or information is required at this time.
CIRNAC-65	Security	Security release framework	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.	Sufficient response has been provided; no further response or information is required at this time. To reiterate, Agnico Eagle will provide a framework that is aligned with the licence and existing policies for future discussions.
CIRNAC-66	Security	Evidence requirements to support security reduction	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.	Sufficient response and evidence have been provided; no further response or information is required at this time.
CIRNAC-67	Security	Escalation, inflation, and timing of security updates	CIRNAC is working with AEM and KivIA to update the Quantum of Security Estimate for the Meadowbank Complex	Noted.

Party ID Number	Subject	Party Second Round Concern	Party Second Round Comment	Agnico Eagle Second Round Response
ECCC-01	Closure Objectives	Closure criteria - stability	ECCC continues to recommend that the Proponent: a) describe the methodology for how stability in water quality will be evaluated; b) discuss whether stability criteria should be included as part of the closure criteria or in the Closure and Post-Closure Monitoring Plan; and c) update the documents accordingly.	At this stage of closure planning, details of how chemical stability will be monitored are presented at a higher level and will be further developed, including the monitoring stations and stability criteria within the CPCMP in the FCP. The current level of detail is considered appropriate for an ICRP.
ECCC-02	TSF Closure	Water quality – tailings cover configurations	ECCC continues to recommend that the Proponent provide information on which parameters exceed water licence criteria in a no cover scenario.	Agnico Eagle plans to cover the TSF as presented in the ICRP, so it is unclear as to the purpose of the request for parameter exceedances with no cover. TSF runoff water quality results from the existing uncovered TSF are readily available in the Meadowbank Annual Report (see sample station ST-21 in Appendix 39 of the 2025 Annual Report).
ECCC-04	CPCMP	Monitoring timelines	ECCC thanks the Proponent for the additional information and recommends that it is included in an updated version of the Closure and Post-Closure Monitoring Plan.	Noted.
ECCC-06	CPCMP	Reduction in frequency of water monitoring at a station	ECCC thanks the Proponent for the additional information and recommends that it is included in an updated version of the Closure and Post-Closure Monitoring Plan.	Noted.
ECCC-12	General Reclamation	Disposal of contaminated soil	ECCC thanks the Proponent for its response and acknowledges that the management approach for the remaining contaminated soil will be addressed in the Final Closure and Reclamation Plan.	Noted.

KIVALLIQ INUIT ASSOCIATION (KivIA)

No additional comments were provided.

CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC)

Refer to Second Round of Comment Response table regarding the additional comments that were provided

ENVIRONMENT AND CLIMATE CHANGE CANADA (ECCC)

Refer to Second Round of Comment Response table regarding the additional comments that were provided

FISHERIES AND OCEANS CANADA (DFO)

No additional comments were provided