Kivalliq Inuit Association
ᑭᓕᓪᓕᖅ ᐃᓄᐃᑦ ᑲᑎᕕᖏᑐᑦ

ᑎᑎᖅᑲᖅᑲᐊᕐᓗᒃ P.O. Box 340
ᖃᖓᑎᖅᓯᓂᖅ, ᓄᓇᕗᑦ Rankin Inlet, Nunavut
X0C0G0

Water Licence 2AM-WTP1830, 2AM-MEA1530

DATE: August 31, 2026

SUBJECT: KIA comments on the Response to Second Round Comments on Meadowbank Complex Interim Closure and Reclamation Plan

ᐊᖏᐃᐊᑦ
Arviat

ᖃᒪᓂᑐᐊᖅ
Baker Lake

ᐃᒡᓗᓕᕐᔪᒃ
Chesterfield Inlet

ᓴᓕᓂᖅ
Coral Harbour

ᓇᐅᔭᑦ
Naujaat

ᖃᖓᑎᖅᓯᓂᖅ
Rankin Inlet

ᑎᑭᕐᔪᐊᖅ
Whale Cove

Dear Mr. Dwyer,

The Kivalliq Inuit Association appreciates the ongoing dialogue with the Proponent and other parties related to the closure of the Meadowbank complex, both as part of the formal Water Licence Amendment process and during separate technical discussions. All parties agree that there should be no detrimental and negative impacts of the project in the post-closure period.

The KIA understands that an updated Interim Closure and Reclamation Plan is necessary to begin progressive reclamation and to collect monitoring data to determine effectiveness of different various closure elements. It is the KIA's view that the fundamental mechanism of chemical and physical stability of the TSF has changed since the plan was presented to the community in 2007, and, in order to support this new design as final, the KIA requires the development of benchmarks and performance indicators to assess the ability of the TSF to sequester tailings from the downstream environment. For clarity, the KIA must have an active role in creating and developing benchmarks and performance indicators. Additionally, the KIA would require that alternatives or contingency measures be developed should the TSF not meet the proposed benchmarks. Development of benchmarks and alternatives will assist in determining reduction of liabilities for security adjustment during progressive reclamation, and provide certainty that the saturation model TSF will perform as well as the fully frozen concept previously presented through impact assessment.

The KIA also notes that many of CIRNAC's technical comments were unaddressed in the Response to Second Round Comments on Meadowbank Complex Interim Closure and Reclamation Plan, and would like to ensure that the Board receives complete responses to Intervenor comments in order to make fully informed decisions.

As expressed in our February 3, 2026 letter, the KIA recognizes that this is not the Final Closure and Reclamation Plan. Further, the KIA is of the view that community consultations are required for any Final Closure and Reclamation Plan, or a component of the ICRP that the Proponent is seeking to treat as final, and KIA reserves the right to make additional comments on the closure of the Meadowbank Complex.

Kivalliq Inuit Association
ᑭᓕᓪᓕᖅ ᐃᓄᐃᑦ ᑲᑎᕋᖅᑎᑦ

ᑎᑎᕆᑲᕆᕆᐊᖓ P.O. Box 340
ᑲᖏᕆᓂᕐᓂᕆ, ᓄᓇᕗᑦ Rankin Inlet, Nunavut
X0C0G0

Thank you for the opportunity to participate in this review.

Sincerely,

Luis Manzo P, Ag.
Director of Lands
Kivalliq Inuit Association
Tel: (867) 645-5731
dirlands@kivalliqinuit.ca