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Sent: June 23, 2025 8:48 AM
To: nirb info <info@nirb.ca>
Subject: [EXTERNAL] Transport Canada's comments for 2024 Annual Report - Meadowbank Complex

Good day,

In response to the Nunavut Impact Review Board's May 23, 2025, request, Transport Canada has reviewed Agnico Eagle Mine Limited's (AEM) Meadowbank Complex 2024 Annual Monitoring Report. Please note that Transport Canada's review was limited to those areas of the monitoring report that are relevant to the Department's mandate and jurisdiction/areas of expertise.

Transport Canada's comments on the Meadowbank Complex 2024 Annual Monitoring Report cover two topic areas:

1. Marine Safety and Security
2. Transportation of Dangerous Goods (TDG)

1. Marine Safety

Comment Number:	TC-01
Subject/Topic:	Inspections - Marine Transportation; Oil Handling Facility
References:	2024 Annual Report, Section 11.8: Shipping Management 2024 Annual Report, Appendix 25: Oil Pollution Emergency Plan
Comment: <ul style="list-style-type: none">• Gap/Issue• Disagreement with the Annual Report conclusion• Reasons for disagreement with the Annual Report conclusion	<ul style="list-style-type: none">• The oil handling facility is in compliance with regulatory requirements as per part 8 of the <i>Canada Shipping Act, 2001</i>. No inspection was carried out in 2024.• The Meadowbank facility meets the requirements of the Marine Transportation Security Regulations and remains in compliance. The certificate for

<ul style="list-style-type: none"> Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix 	<p>Occasional-use Marine Facility is current and valid. No inspection was completed in 2024.</p> <ul style="list-style-type: none"> No enforcement activity was undertaken or required last year by Transport Canada.
Conclusion/Request	None

Comment Number:	TC-02
Subject/Topic:	Marine Transportation – 2025 Annual Notice to Mariners
References:	2023 Annual Report, Section 11.8: Shipping Management
<p>Comment:</p> <ul style="list-style-type: none"> Gap/Issue Disagreement with the Annual Report conclusion Reasons for disagreement with the Annual Report conclusion Disagreement and reasons for disagreement with conclusions within the Additional Documents in Appendix 	<p>Transport Canada recommends the Proponent make vessel operators serving the Project aware of the 2025 Annual Notice to Mariners, and in particular section A2 Marine Mammal Guidelines and Marine Protected Areas and section 7A Voyage Planning for Vessels Intending to Navigate in Canada’s Northern Waters and section 7C Vessels Intending to Navigate in Kitikmeot Region in Canada’s Northern Waters (see: Annual Notice to Mariners at: https://publications.gc.ca/collections/collection_2025/mpo-dfo/Fs151-4-2025-eng.pdf).</p>
Conclusion/Request	Transport Canada requests that the above information be brought to AEM’s attention.

Comment Number:	TC-03
Subject/Topic:	Shipping Management - Biofouling
References:	2024 Annual Report, Appendix 59: Shipping Management Plan Version 5 (March 2025)

<p>Comment:</p> <ul style="list-style-type: none"> • Gap/Issue • Disagreement with the Annual Report conclusion • Reasons for disagreement with the Annual Report conclusion • Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix 	<p>The following is for the information of AEM, NIRB, and reviewers of the 2024 Annual Report on the subject of biofouling:</p> <ul style="list-style-type: none"> • In Fall 2022, Transport Canada published its Voluntary Guidance for Relevant Authorities on In-Water Cleaning of Vessels (canada.ca), which includes a biofouling management plan and biofouling record book templates that have been well regarded internationally. The guidance provides clarity to stakeholders (competent authorities, vessel owners and operators, and in-water clean-up service providers) on recommended best practices that can be used to manage the biosecurity and water quality risks associated with cleaning vessels underwater. • The International Maritime Organization's (IMO) Marine Environment Protection Committee (MEPC) adopted the revised "Guidelines for the Control and Management of Ship's Biofouling to Minimize the Transfer of Invasive Aquatic Species" (https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.378%2880%29.pdf). These guidelines provide recommendations on in-water inspections with a focus on the quantitative assessment of biofouling using a biofouling rating number, as well as on observations of the anti-fouling system condition, which will assist vessel owners and operators in minimizing the transfer of potentially harmful aquatic species, following globally agreed guidance.
<p>Conclusion/Request</p>	<p>Transport Canada requests that the above information be brought to AEM's attention.</p>

2. Transportation of Dangerous Goods (TDG)

Comment Number:	TC-04
Subject/Topic:	Transportation of Dangerous Goods / Hazardous Materials
References:	2024 Annual Report, Section 6.1.1.3 – Hazardous and non-hazardous waste
Comment: <ul style="list-style-type: none">• Gap/Issue• Disagreement with the Annual Report conclusion• Reasons for disagreement with the Annual Report conclusion• Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix	No TDG monitoring was carried out at the Meadowbank Complex by Transport Canada in 2024. No complaints/concerns regarding TDG were received by Transport Canada the Department did not undertake any enforcement actions.
Conclusion/Request	None

Comment Number:	TC-05
Subject/Topic:	Transportation of Dangerous Goods / Hazardous Materials
References:	2024 Annual Report, Section 6.1.1.3 – Hazardous and non-hazardous waste 2024 Annual Report, Appendix 21 - Meadowbank 2023 Hazardous and Non-Hazardous Waste Transport Manifest
Comment: <ul style="list-style-type: none">• Gap/Issue• Disagreement with the Annual Report conclusion	Appendix 21 provides a list/summary of hazardous (dangerous) goods that were shipped from the site. It would assist future reviews of the Annual Report if copies of the dangerous goods shipping documents

<ul style="list-style-type: none"> Reasons for disagreement with the Annual Report conclusion Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix 	were included with the annual report rather than simply a summary.
Conclusion/Request	Transport Canada requests that NIRB bring this to AEM's attention.

Comment Number:	TC-06
Subject/Topic:	Transportation of Dangerous Goods / Hazardous Materials
References:	2024 Annual Report, Section 11.5.8 Inspections and Compliance Reports – Transport Canada Marine Safety and Security
<p>Comment:</p> <ul style="list-style-type: none"> Gap/Issue Disagreement with the Annual Report conclusion Reasons for disagreement with the Annual Report conclusion Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix 	<p>At p. 396 of the 2024 Annual Report, AEM reported:</p> <p>“Transport Canada conducted an inspection focusing on the Transportation of Dangerous Goods (TDG) on November 19th, 2024, of the QSL International Ltd terminal in Bécancour, for dangerous goods shipped by Agnico Eagle from the Meadowbank Mine. The inspection report, received on December 19th, 2024, contained action items pertaining to TDG corrective measures required. All findings in the inspection report were corrected.</p> <p>An official document describing the corrective actions taken by Agnico Eagle to ensure future compliance and the safe transportation of dangerous goods will be submitted to Transport Canada in 2025.”</p> <p>Transport Canada confirms that AEM provided the Department with the required information and that the non-compliance issues noted in the inspection report were addressed.</p>

Conclusion/Request	None.
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Please follow-up with me if you have any questions about Transport Canada's review of the 2024 Annual Report for the Meadowbank Complex.

Regards,

Scott Kidd

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