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Prairie & Northern Region
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ECCC File: 6100 000 008/002, 014
NIRB File: 03MN107, 16MN056

June 23, 2025

via email at: info@nirb.ca

Aghalingiak Ohokannoak
Public Registry Coordinator
Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Aghalingiak Ohokannoak:

RE: 03MN107, 16MN056 – Agnico-Eagle Mines Ltd. – Meadowbank Complex – 2024 Annual Report

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) by Agnico-Eagle Mines Ltd. ("the Proponent") regarding the above-mentioned annual report.

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

ECCC will copy the NIRB on any water quality comments submitted to the Nunavut Water Board (NWB) for the review of the Meadowbank Complex 2024 Annual Report, due July 17, 2025.

The following comments are provided:

1. External contact information – incorrect attribution of telephone number

Reference:

Meadowbank Complex 2024 Annual Report
- Appendix 46. Emergency Response Plan (v.20a)
    - Section 3. Process – External Emergency Contact Information (p. 57)

Comment:

One of the rows in this table is for “Environment Canada: 24-hour emergency pager monitored by Emergency and Enforcement”. One of the listed telephone numbers (867-920-8130) and the fax number (867-873-6924) are for the NT-NU 24-hour Spill Report Line.

ECCC Recommendation:

ECCC recommends the Proponent verify whether it was intentional to report telephone and fax numbers for the NT-NU 24-Hour Spill Report Line in the row for “Environment Canada: 24-hour emergency pager monitored by Emergency and Enforcement”.

2. Leaks and drips from equipment and vehicles

Reference:

Meadowbank Complex 2024 Annual Report
- Appendix 22. Spill Contingency Plan (v.22)
    - Section 5. Action Plan (p. 26)

Comment:

Section 5 provides a list of potential spill events that could occur as part of the project. One potential event that was not included is: “Leaks or drips of hazardous substances or fuels due to malfunction of equipment and vehicles”. It is noted that spills have occurred at the Project site over the last year due to this scenario taking place.

ECCC Recommendation:

ECCC recommends the Proponent consider including leaks or drips of hazardous substances or fuels due to malfunction of equipment and vehicles in the list of potential spill events.

3. Quantity of hazardous substances

Reference:

Meadowbank Complex 2024 Annual Report
- Appendix 22. Spill Contingency Plan (v.22)
    - Section 6. Hazardous Materials Stored on Site, Table 7. Materials stored at site during operations (pp. 35-36)

Comment:

Table 7 in the Spill Contingency Plan lists the maximum amount of each hazardous substance per unit (e.g., per sea can, per truck, per bag, etc.); however, it does not list how many units of each substance would likely be stored on site, nor the total quantity of the substance that would be expected by weight or volume. A knowledge of total volume on the site is relevant when preparing for and responding to spills, and it is therefore recommended that this information be provided in an additional column. Furthermore, it is recommended that a column be added to

this table listing any mitigation measures that will be used for storage of each hazardous substance (as appropriate) to prevent leaks or spills (e.g., use of secondary containment).

ECCC Recommendation:

ECCC recommends the Proponent include the following information in the table:

- Maximum amount of each substance anticipated to be on-site (by total weight or volume)
- Mitigation measures that will be used for each substance to prevent leaks or spills

4. Maps in Spill Contingency Plan

Reference:

Meadowbank Complex 2024 Annual Report
- Appendix 22. Spill Contingency Plan (v.22)
    - Section 2.1. Prevention and Inspections, Figures 1-5. Site Maps (pp. 5-9)

Comment:

The Spill Contingency Plan has several site maps indicating fuel storage locations, landfarm locations, etc.; however, the maps do not list the locations of other hazardous substances that are stored on site. Inclusion of these locations on the map is recommended, as the Spill Contingency Plan will be relied on in emergency situations, and a general awareness of all potential sites where spills of hazardous substances could occur (and the types of substances that could spill) can support preparedness and situational awareness during response.

ECCC Recommendation:

ECCC recommends the Proponent include storage locations for other hazardous substances (in addition to hydrocarbons / fuels) on the site maps within the Spill Contingency Plan.

5. General mitigation measures

References:

Meadowbank Complex 2024 Annual Report
- Appendix 22. Spill Contingency Plan (v.22)
    - Section 2.1. Prevention and Inspections (p. 4)
- Appendix 43. Hazardous Materials Management Plan (v.8)
    - Section 2.3. General Hazardous Materials Storage Guidelines (pp. 8-9)

Comment:

There are several additional mitigation measures / storage best practices that contribute to spill prevention, included within the Hazardous Materials Management Plan (Section 2.3 General Hazardous Materials Storage Guidelines; pp. 8-9). It is recommended that a reference to the Hazardous Materials Management Plan be placed in Section 2.1 of the Spill Contingency Plan

to ensure that the full range of mitigation measures and storage practices that will be used are communicated.

Additionally, it is recommended that the language on one suggested principle: "*Encourage workers to take reasonable measures to prevent spills*" be strengthened, as it would be an expectation that workers would take reasonable measures.

ECCC Recommendation:

ECCC recommends the Proponent:

- Add within the Spill Contingency Plan a reference to the Hazardous Materials Management Plan to indicate that additional mitigation measures and storage practices may be found in that document.
- Consider changing the language of the bullet: "*Encourage workers to take reasonable measures to prevent spills*" to strengthen the mitigation measure, e.g., "*Require workers to take all reasonable measures to prevent spills*".

6. Vehicle, equipment, and refueling mitigation measures

References:

Meadowbank Complex 2024 Annual Report
- Appendix 22. Spill Contingency Plan (v.22)
    - Section 5. Mitigation of Risks (pdf pp. 188-190)
- Appendix 43. Hazardous Materials Management Plan (v.8)

Comment:

The Spill Contingency Plan contains a section detailing the procedures and safeguards that will be in place for fuel transfer to and from the Baker Lake Oil Handling Facility (Section 5 Mitigation of Risks; pdf pp. 188-190). What is currently not reflected in the Spill Contingency Plan (or the Hazardous Materials Management Plan) is a section on refueling of equipment and vehicles (i.e., focusing on smaller scale refueling procedures located closer to the point of use, rather than bulk fuel transfer). Refueling of vehicles and equipment can present a risk of leaks or spills.

Additionally, the use of vehicles and equipment themselves can pose risk of leaks and spills of fuels and hydrocarbons to the environment. Neither the Spill Contingency Plan nor Hazardous Materials Management Plan currently contain information related to mitigation measures for vehicle and equipment leaks and spills. It is recommended that a section be added to the Spill Contingency Plan or Hazardous Materials Management Plan to highlight the best practices and mitigation measures that will be in place related to refueling and use of vehicles and equipment.

ECCC Recommendation:

ECCC recommends the Proponent include a section on mitigation measures within the Spill Contingency Plan or Hazardous Materials Management Plan related to refueling and use of equipment and vehicles. Measures that form standard best practices in similar projects and could be considered for this section include (but are not limited to):

- Use of drip trays or absorbent mats at refueling locations to prevent drips;
- Fuel nozzles equipped with automatic shutoffs;
- Operators stationed at both ends of hoses during refueling operations, unless both ends of the hose are visible and accessible by one operator;
- Fuel remaining in hoses is discharged into equipment or returned to the storage container;
- Refuel at least 31 m from the normal high-water mark of any water body;
- Provide adequate lighting at refueling areas;
- Use of secondary containment for any equipment with a built-in fuel tank;
- Regular inspection of vehicles and equipment for drips or leaks, as well as regular maintenance;
- Use of biodegradable hydraulic oil (when appropriate) for equipment that is working near or in water;
- Park vehicles and equipment over a drip tray or absorbent mat overnight, and at a location that is at least 31 m from the normal high-water mark of any water body.

7. Storage of hazardous substances

References:

Meadowbank Complex 2024 Annual Report
- Appendix 43. Hazardous Materials Management Plan (v.8)
    - Section 2.3.2. General Guidelines for Storage Areas (pp. 8-9)

Comment:

This section contains several guidelines where edits or clarifications are recommended:

- For the guideline: "*Where necessary secondary containment is installed to allow for the containment of at least 110% of the largest container or tank volume within the contained area*", the plan should specify what criteria the Proponent would use to determine when secondary containment is necessary. It is recommended that secondary containment be employed as much as possible for storage of hazardous materials to prevent their release to the environment in the event of a leak or spill.
- For the guideline: "*Storage areas are located at least 30 metres from surface water and on a low permeability area*", it is recommended that this be changed to 31 m to align with the setback distance specified in the annual report.
- For the guideline: "*Storage areas are adequately signed indicating that hazardous materials/wastes are stored therein*", it is recommended that additional information be added to the signs to indicate that smoking should not take place within 15 m of the storage areas. Smoking near these areas poses a risk of igniting flammable vapours.
- For the guideline: "*Adequate spill and emergency response equipment has been installed at large volume storage areas – i.e., bulk fuel tank facilities (i.e. spill control, fire protection, etc.). A list of spill control equipment is provided in the Spill Contingency*

Plan", it is recommended that appropriate spill and emergency response equipment (e.g., a spill kit at minimum) be located near all locations where hazardous materials are being used, not exclusively large volume storage areas.

ECCC Recommendation:

ECCC recommends the Proponent:

- Specify when secondary containment would be employed for the storage of hazardous materials (i.e., for what type of materials, or in what situations);
- Change the setback distance to water to 31 m to align with that specified in the annual report;
- Add additional information to the signs demarcating hazardous materials storage areas to specify no smoking within 15 m of the storage area;
- Place appropriate spill response equipment (e.g., a spill kit) at all sites where hazardous materials are stored (i.e., not only at large volume storage areas).

8. Vehicle maintenance and safety

References:

Meadowbank Complex 2024 Annual Report

Meadowbank Complex 2022 Annual Report
- Appendix 46. Whale Tail Haul Road Management Plan (v.4)
    - Section 9.1. Accidents and Malfunctions (p. 27)

Comment:

A list of potential causes for vehicle accidents is listed in this section. One type listed is: "*Risk of people getting stuck on the road in bad weather such as in heavy snow or whiteout conditions, or due to mechanical breakdown*".

Mechanical breakdown could also result in spillage of potentially harmful materials to the environment, either because it caused an accident where a subsequent spill occurred, or the mechanical breakdown itself resulted in the release (e.g., loss of vehicle fluids).

In the list of non-reportable spills for 2024, there are instances where mechanical breakdown / failure led to loss of hazardous substances, including hydraulic oil, diesel, coolant, and engine oil to the environment.

A potential mitigation measure for this scenario is the regular inspection of vehicles for drips / leaks.

ECCC Recommendation:

ECCC recommends the Proponent add the possibility for spills or leaks of potentially harmful materials in the event of a vehicle accident caused by a mechanical breakdown.

9. Sensory Disturbance on Birds - Lighting

References:

Meadowbank Complex 2024 Annual Report
- Appendix 38. Terrestrial Ecosystem Management Plan (TEMP) (v.9)

Comment:

Term & Condition 58 of NIRB Project Certificate 004 requires the Proponent to design the lighting and use of lights at the mine site to minimize the disturbance of lights on sensitive wildlife and birds.

Lighting at the mine site was not mentioned in the Meadowbank Complex 2024 Annual Report.

This issue was raised previously in comments on the Meadowbank Complex 2023 Annual Report and is not addressed in the current report.

ECCC Recommendation:

ECCC recommends the Proponent clarify how light disturbance on sensitive wildlife and birds was monitored and/or mitigated at the mine site(s) in 2023 and 2024.

Light disturbance monitoring should be included in the updated TEMP and be made available for review.

10. Mortality Threshold for Waterbirds

Reference:

Meadowbank Complex 2024 Annual Report
- Appendix 38. Terrestrial Ecosystem Management Plan (TEMP) (v.9)
    - Section 3.7.3.3. Project-Related Mortality, Table 17. Monitoring Approach for Waterbirds at the Meadowbank, Whale Tail Mine and Haul Road

Comment:

The 2024 TEMP reports six long-tailed duck mortalities in 2024. Long-tailed ducks are a waterbird, specifically a species of migratory waterfowl.

According to Section 3.7.2.2 of the TEMP, “The threshold level of mortality beyond which further mitigation will be required is one Waterbird per year”.

Section 3.7.3.3 Project-Related Mortality indicates the Proponent will discuss and implement further mitigation in consultation with ECCC to minimize effects.

ECCC Recommendation:

ECCC recommends the Proponent consult with ECCC about how further mitigation measures could be implemented at the mine site(s) to help prevent further waterbird mortalities going forward.

Updated, clear waterbird mortality mitigation measures should be included in the updated TEMP and be made available for review.

11. ECCC Contact Information

References:

Meadowbank Complex 2024 Annual Report
- Appendix 39. 2024 Wildlife Monitoring Summary Report
    - Section 4.5.8. Wildlife Mortality – Meadowbank and Whale Tail Sites, Table 4-8. Wildlife Mortalities at Meadowbank and Whale Tail Sites in 2024

Comment:

ECCC has management responsibilities for migratory birds under the *Migratory Birds Convention Act* (MBCA). ECCC should be contacted in instances involving:

- Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species;
- Updates to wildlife management and monitoring plans, or their equivalents, in relation to these species.

The Proponent's 2024 Wildlife Monitoring Summary Report states "A small group of ducks flew into the side of the Mill building in between Mill Door B and Mill Door C. One of the seven birds survived. These were originally believed to be black scoters but have since been identified as long-tailed ducks."

ECCC's Canadian Wildlife Service does not have a record of notification for this incident, despite the Proponent's TEMP stating "reporting for migratory bird mortalities and incidents need to be directed to ECCC (reports are to be sent to: cwsnorth-scfnord@ec.gc.ca").

ECCC Recommendation:

ECCC recommends the Proponent notify ECCC's Canadian Wildlife Service (cwsnorth-scfnord@ec.gc.ca) for instances involving:

a) Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species;
b) Updates to wildlife management and monitoring plans, or their equivalents, in relation to these species.

12. Timing of heavy rainfall

References:

Meadowbank Complex 2024 Annual Report
- Section 2.1. 2024 Activities
- Section 8.21. Climate Monitoring, Table 8-83. Meadowbank 2024 Monthly Climate Data

Comment:

In Section 2.1, the text mentions challenging conditions with heavy rainfall in October for the Meadowbank Complex. However, in Section 8.21, Table 8-83 shows precipitation totals of 130.05 mm for September compared to 26.1 mm for October. Maximum daily precipitation values were 20.0 mm in September compared to 5.6 mm for October. Thus, based on Table 8-83, it appears that September would have been potentially more problematic for heavy rainfall.

ECCC Recommendation:

ECCC recommends that the statement regarding heavy rainfall in Section 2.1 be reconciled with the rainfall values presented in Table 8-83.

13. Compliance Monitoring Comment – Meadowbank Gold Mine

Reference(s)

Comment Request for Agnico-Eagle Mines' Meadowbank Complex 2024 Annual Report

Comment

- No authorizations from ECCC have been issued.

- The AEM, Meadowbank Gold Project is captured under the following pieces of ECCC legislation:

1. **Fisheries Act:**

- Pollution Prevention Provisions (i.e. subsection 36(3))

- Metal and Diamond Mining Effluent Regulations (MDMER)

2. **Canadian Environmental Protection Act:**

- Environmental Emergency Regulations

- Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations

- Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations

- National Pollutant Report Inventory

3. **Greenhouse Gas Pollution Pricing Act:**

- Output-Based Pricing System Regulations

ON-SITE INSPECTIONS:

1. From September 24-25, 2024, a Multi-Reg on-site inspection conducted at Meadowbank to verify compliance under FA and CEPA. On September 26 an on-site inspection was conducted at the Baker Lake Oil Handling & marshalling facilities.

2. MDMER chemistry and toxicity sampling not conducted at the FDP's during this inspection as they were not discharging to the receiving environment.

3. No non-compliance determined from these inspections.

MDMER:

The Project is subject to the MDMER. The purpose of the MDMER is to authorize a deposit of certain deleterious substance(s) into water frequented by fish while monitoring the environmental effects of those deposits to ensure that deleterious substances are not released in quantities or concentrations that could result in harmful effects on waters frequented by fish. To do this certain effluent deposit conditions (concentrations, limits and parameters) apply so that regulatees are exempted and protected from the more stringent prohibition of subsection 36(3) under the Fisheries Act. Samples of the effluent by AEM must be taken and tested at the identified Final Discharge Point (FDP) to ensure the above conditions are met on a scheduled basis and reported. The two current FDPs are as follows:

1. Vault Discharge FDP ST-MMER-1 - Effluent from Vault Attenuation Pond pumped and discharged to Wally Lake;
2. East Dike Discharge FDP ST-MMER-3 - East Dike Seepage effluent from Second Portage Lake pumped back to Second Portage Lake.

MDMER reports are to be submitted via ECCC's online database (Mine Effluent Reporting System - MERS) which are reviewed by an assigned Enforcement Officer on a quarterly basis. The quarterly administrative regular report verifications are conducted to ensure that the sampling and testing has been conducted in accordance with the MDMER and ensuring the reports are submitted on time. Each Enforcement Activity includes an administrative report verification of each quarterly report which are due 45 days at the end of each quarter: 1st Quarter (due May 15), 2nd Quarter (due Aug 14), 3rd Quarter (due Nov 14) and 4th Quarter (due Feb 14), as well as an administrative report regular verification of the 2024 Annual Effluent Monitoring Summary Report (due March 31). Furthermore, an administrative report regular verification was completed on the Environmental Effects Monitoring (EEM) 2024 Annual Report (information related to effluent and water quality monitoring studies).

AEM submitted all required MDMER reports:

1. 2024 First Quarter:
   - Report submitted on time
   - Vault Discharge FDP ST-MMER-1: No effluent discharged in Q1 therefore no non-compliance was determined

- East Dike Discharge FDP ST-MMER-3: Effluent discharged in Q1. No non-compliance was determined

2. 2024 Second Quarter:

- Report submitted on time
- Vault Discharge FDP ST-MMER-1: No effluent discharged in Q2 therefore no non-compliance was determined
- East Dike Discharge FDP ST-MMER-3: Effluent discharged in Q2. No non-compliance was determined

3. 2024 Third Quarter:

- Report submitted on time
- Vault Discharge FDP ST-MMER-1: No effluent discharged in Q3 therefore no non-compliance was determined
- East Dike Discharge FDP ST-MMER-3: No effluent discharged in Q3 therefore no non-compliance was determined

4. 2024 Fourth Quarter:

- Report submitted on time
- Vault Discharge FDP ST-MMER-1: No effluent discharged in Q4 therefore no non-compliance was determined
- East Dike Discharge FDP ST-MMER-3: Effluent was discharged in Q4 no non-compliance was determined

5. 2024 Annual Effluent Monitoring Report:

- Report was submitted on time and no compliance issues noted

6. 2024 Annual EEM Report:

- Report was submitted on time and no compliance issues noted

ECCC Files Regarding Reported 2024 Spills:

1. 2024-294 - Lead agency CIRNAC – Baker Lake Oil Handling Marshalling Facility – Diesel Fuel Release – CEPA 201(1) & E2R – File Closed
2. 2024-340/365 - Lead agency CIRNAC – Baker Lake Oil Handling Marshalling Facility – Suspended Solids Release into Baker Lake – FA 36(3) – File Closed
3. 2024-222 - Lead agency CIRNAC – Baker Lake Oil Handling Marshalling Facility – Suspended Solids Release into Baker Lake – FA 36(3) – File Closed
4. 2024-194 - Lead agency CIRNAC – Spill on Unnamed Lake – Engine Oil Release – FA 36(3) – File Closed

5. 2024-364- Lead agency CIRNAC – Freshet Suspended Solids release to NP2 Lake – FA 36(3) – File Closed

ECCC Recommendation(s)

N/A

14. Compliance Monitoring Comment – Whale Tail Pit

Reference(s)

Comment Request for Agnico-Eagle Mines' Meadowbank Complex 2024 Annual Report

Comment

- No authorizations from ECCC have been issued.
- The AEM, Whale Tail Gold Project is captured under the following pieces of ECCC legislation:

1. Fisheries Act:

- Pollution Prevention Provisions (i.e. subsection 36(3))
- Metal and Diamond Mining Effluent Regulations (MDMER)

2. Canadian Environmental Protection Act:

- Environmental Emergency Regulations
- Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations
- Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations
- National Pollutant Report Inventory

3. Greenhouse Gas Pollution Pricing Act:

- Output-Based Pricing System Regulations

ON-SITE INSPECTION:

1. On September 25, 2024, a Multi-Reg on-site inspection was conducted to verify compliance under the FA & CEPA. At the time of inspection final discharge point ST-MDMER-11 was sampled for the below parameters:

a. Multi-concentration *Daphnia magna* = Sample exceeded holding time therefore a laboratory analysis was not conducted.

b. Suspended Solids = 5 mg/l

c. Cyanide = <0.01 mg/l

d. Hardness = 245 mg/l

e. Un-ionized Ammonia = 0.52 mg/l

f. Total Metals/**MDMER Metals**:

- Aluminum, Total Recoverable mg/L - - 0.035
- Antimony, Total Recoverable * mg/L - - <0.038
- **Arsenic**, Total Recoverable * mg/L - - <0.018
- Barium, Total Recoverable mg/L - - 0.076
- Beryllium, Total Recoverable * mg/L - - <0.010
- Boron, Total Recoverable mg/L - - 0.042
- Cadmium, Total Recoverable * mg/L - - <0.010
- Calcium, Total Recoverable * mg/L - - 70.0
- Chromium, Total Recoverable mg/L - - <0.010
- Cobalt, Total Recoverable mg/L - - 0.010
- **Copper**, Total Recoverable mg/L - - <0.010
- Iron, Total Recoverable mg/L - - 0.0557
- **Lead**, Total Recoverable mg/L - - 0.010
- Lithium, Total Recoverable * mg/L - - 0.014
- Magnesium, Total Recoverable * mg/L - - 15.4
- Manganese, Total Recoverable mg/L - - 0.168
- Molybdenum, Total Recoverable mg/L - - <0.010
- **Nickel**, Total Recoverable mg/L - - 0.012
- Phosphorus, Total Recoverable * mg/L - - <0.010
- Potassium, Total Recoverable * mg/L - - 13.9
- Selenium, Total Recoverable * mg/L - - <0.020
- Sodium, Total Recoverable * mg/L - - 11.4
- Strontium, Total Recoverable mg/L - - 0.662
- Thallium, Total Recoverable mg/L - - <0.020
- Thorium, Total Recoverable * mg/L - - 0.010
- Titanium, Total Recoverable mg/L - - <0.010
- Uranium, Total Recoverable * mg/L - - <0.010
- Vanadium, Total Recoverable mg/L - - 0.058
- **Zinc**, Total Recoverable mg/L - - <0.010

g. Radium-226 = NA

h. Field pH = 7.2

i. Field Temp = 1.0 degrees

j. Field Conductivity = 595

2. The Laboratory sample analysis concluded that the effluent discharged at FDP ST-MDMER-11 was within compliance of the criteria found under MDMER.

3. No other instances of non-compliance were noted.

4. No non-compliance determined from this inspection.

MDMER:

The Project is subject to the MDMER. The purpose of the MDMER is to authorize a deposit of certain deleterious substance(s) into water frequented by fish while monitoring the environmental effects of those deposits to ensure that deleterious substances are not released in quantities or concentrations that could result in harmful effects on waters frequented by fish. To do this certain effluent deposit conditions (concentrations, limits and parameters) apply so that regulatees are exempted and protected from the more stringent prohibition of subsection 36(3) under the Fisheries Act. Samples of the effluent by AEM must be taken and tested at the identified Final Discharge Point (FDP) to ensure the above conditions are met on a scheduled basis and reported. The three current FDPs are as follows:

1. FDP ST-MDMER-5:

- Both Whale Tail North Basin and A53 were intakes during the dewatering activities. Currently, if a discharge is required, water intake is the WT Attenuation Pond water (dewatered Whale Tail North Basin) pumped into Whale Tail Lake South Basin.

2. FDP ST-MDMER-8:

- Water intake is from the Whale Tail or IVR attenuation pond, treated at the ASWTP and discharged to Kangislulik Lake (formerly Mammoth Lake) via a diffuser.

3. FDP-ST-MDMER-11:

- Water intake is from the Whale Tail or IVR attenuation pond, treated at the ASWTP and discharged to Whale Tail South Lake via a diffuser.

MDMER reports are to be submitted via ECCC’s online database (Mine Effluent Reporting System - MERS) which are reviewed by an assigned Enforcement Officer on a quarterly basis. The quarterly administrative regular report verifications are conducted to ensure that the sampling and testing has been conducted in accordance with the MDMER and ensuring the reports are submitted on time. Each Enforcement Activity includes an administrative report verification of each quarterly report which are due 45 days at the end of each quarter: 1st Quarter (due May 15), 2nd Quarter (due Aug 14), 3rd Quarter (due Nov 14) and 4th Quarter (due Feb 14), as well as an administrative report regular verification of the 2024 Annual Effluent Monitoring Summary Report (due March 31). Furthermore, an administrative report regular verification was completed on the Environmental Effects Monitoring (EEM) 2024 Annual Report (information related to effluent and water quality monitoring studies).

AEM submitted all required MDMER reports:

1. 2024 First Quarter:

- Report submitted on time

- FDP ST_MDMAER-5: No effluent discharged in Q1 therefore no non-compliance was determined

- FDP ST_MDMER-8: No effluent discharged in Q1 therefore no non-compliance was determined

- FDP-ST-MDMER-11: No effluent discharged in Q1 therefore no non-compliance was determined

2. 2024 Second Quarter:

- Report submitted on time

- FDP ST_MDMAER-5: No effluent discharged in Q2 therefore no non-compliance was determined

- FDP ST_MDMER-8: No effluent discharged in Q2 therefore no non-compliance was determined

- FDP-ST-MDMER-11: Effluent discharged in Q2. No non-compliance was determined

3. 2024 Third Quarter:

- Report submitted on time

- FDP ST_MDMAER-5: No effluent discharged in Q3 therefore no non-compliance was determined

- FDP ST_MDMER-8: Effluent discharged in Q3. No non-compliance was determined

- FDP-ST-MDMER-11: No effluent discharged in Q3 therefore no non-compliance was determined

4. 2024 Fourth Quarter:

- Report submitted on time

- FDP ST_MDMAER-5: No effluent discharged in Q4 therefore no non-compliance was determined

- FDP ST_MDMER-8: No effluent discharged in Q4 therefore no non-compliance was determined

- FDP-ST-MDMER-11: Effluent discharged in Q4. No non-compliance was determined

5. 2024 Annual Effluent Monitoring Report:

- Report was submitted on time and no compliance issues noted

6. 2024 Annual EEM Report:

- Report was submitted on time and no compliance issues noted

ECCC Files Regarding Reported 2024 Spills:

1. 2024-186 - Lead agency CIRNAC – Spill at KM 173 – Engine Oil Release – CEPA 201(1) – File Closed

2. 2024-293 - Lead agency CIRNAC – Spill at KM 124 – Diesel Fuel Release – CEPA 201(1) / E2R – File Closed

ECCC Recommendation(s):

N/A

If you need more information, please contact Erik Allen at Erik.Allen@ec.gc.ca.

Sincerely,

Allen, Erik

Digitally signed by: Allen, Erik
DN: CN = Allen, Erik C = CA O = GC OU = EC-EC
Date: 2025.06.23 16:43:47 -04'00'

Erik Allen
Senior Environmental Assessment Officer

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