



2. Review of Project Certificate Compliance

TC #	Terms and Conditions Project Certificate 006 Amendment 2	Compliance with Project Certificate (Yes/No/In Progress)	Additional Comments
2	<p>The Proponent shall demonstrate through monitoring of air quality at the aboveground emissions points at the mine site and at the Tiriganiaq site that sulphur dioxide (SO2) and nitrous dioxide (NO2) emissions remain within predicted levels and, where applicable, within limits established by all applicable guidelines and regulations. In cases where exceedances occur, the Proponent shall provide an explanation for the exceedance, a description of planned mitigation, and shall conduct additional monitoring to evaluate the effectiveness of mitigative measures.</p>	In Progress	<p>The measured air quality parameters (NO2, SO2, dust fall) did not exceed regulatory guidelines, except for the dust fall at station DF-4, which is down wind of the mine site and very close to Tiri OP-1. Increased site activity appears to be the reason for this. The KivIA requests that the Proponent review its operational procedures, such as speed limits and the use of water and/or calcium chloride to better control dust, especially during periods of above average wind speed.</p>
6	<p>The Proponent shall employ appropriate dust suppression measures when conducting activities in the landfill such as topping or capping.</p>	Yes	<p>Compaction of landfill material plus progressive capping with waste rock is being used to control dust and windblown debris. Ten (10) of thirteen (13) soil samples from the Waste Farm A soil windrows remediation failed GN's industrial soil remediation criteria. On-going remediation of the Waste Farm A soil windrows will continue during 2025 to resolve this issue.</p>
10	<p>The Proponent shall further develop and implement its noise abatement plan to protect people and wildlife from mine activity noise, including, blasting, drilling, equipment, vehicles and aircraft. The noise abatement plan will be developed in consultation the Government of Nunavut, Environment Canada and Health Canada as appropriate, and at a minimum is to include: a. Restrictions on blasting and drilling when migrating caribou, birds or local carnivores may be affected; b. The establishment of strict standards for noise levels; use of equipment and vehicles with the best noise attenuation devices; c. When practical, the use of fences or berms around noisy machinery or sites;</p>	In Progress	<p>(i) Progress on implementing TC10 in 2024 was apparent as Agnico Eagle further responded to TAG questions on the 2023 noise study (Appendix 38). The study had measured how noise levels were reduced during Level 3 mitigation including the use of stacked sea cans at the mine site to attenuate noise disturbance to caribou. The March 2024 presentation to TAG showed how switching from Full Operations to Level 3 reduced the spatial extent of areas within 5km of the mine site where caribou may hear noise from Meliadine operations relative to differing wind strengths.</p> <p>(ii) Agnico Eagle has a blasting protocol to reduce any risks of blasting to caribou (Appendix 29-17; Section 4.5.3.4) and monitors the blasting noise (Appendices 22 and 23). The 2024 Annual report describes that blasting monitoring of Peak particle velocity (PPV) and overpressure did not exceed the guidelines relevant for fish (Annual Report; Sections 7.6 and 7.7; Appendix 22). The Annual Report (Appendix 26) did not cross reference exposure of caribou to blasting in 2024. However, Agnico Eagle through a consultant's report (30 April 2025) provided to TAG did compare dates of surface blasting,</p>





<p>25</p>	<p>The Proponent shall submit a detailed Groundwater Management Plan and/or Adaptive Management Plan to the NIRB which includes mitigation measures designed to address the potential for higher-than-predicted volumes of saline water inflows into the underground mine, treatment and disposal methods, and details of its plan to monitor saline water at site prior to disposal through the waterlines to Melvin Bay. The plans must identify uncertainties pertaining to predictions for groundwater quality and quantity and inform adaptive water management strategies for the site which may include the management of saline groundwater and surface contact water, and identifies discrepancies between predicted groundwater inflow from 2014, 2020 and future modelling, as well as between predicted and actual groundwater inflows. Unless specified in the Groundwater Management Plan and/or Adaptive Management Plan, while the dual waterlines are operational, they will be used to their full capacity by managing the release of 6,000 m3/day to 12,000 m3/day of treated saline effluent and the remainder (8,000 m3/day to 14,000 m3/day) comprised of surface contact water to a total capacity of 20,000 m3/day.</p> <p>25a: The proponent shall minimize or eliminate surface contact water discharges to Meliadine Lake by discharging on-site surface contact water in accordance with the Groundwater Management Plan and /or Adaptive Management Plan.</p> <p>25b: The Groundwater Management Plan and/or Adaptive Management Plan must set out the guiding principles, normal operating conditions, and the adaptive thresholds for management of water for the waterlines and any other matters as directed by the Board.</p> <p>25c: The Proponent shall manage the total daily volumes of water it is authorized to discharge via the dual waterlines into Melvin Bay in accordance with the Groundwater Management Plan and/or Adaptive Management Plan.</p> <p>25d: The proponent shall update the Adaptive Management Plan for NIRB review and acceptance within six months of receiving the amended project certificate.</p> <p>25e: The Proponent shall consult KIA, GKD, CIRNAC, ECCC and DFO, with respect to the contents of the Plans and any required adaptive management and mitigation measures.</p>	<p>Yes</p>	<p>The Proponent has updated the Adaptive Management Plan with input from the KivIA and CIRNAC. Specifically, a workshop was held in Ottawa to address outstanding concerns and include future infrastructure in the Adaptive Management Plan.</p>
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			used, caribou crossing sections of the AWAR should be described.
56	The Proponent shall report annually to the NIRB regarding its terrestrial environment monitoring efforts, with inclusion of the following information: a. Description of all updates to terrestrial ecosystem baseline data; b. A description of the involvement of Inuit in its monitoring programs; c. A detailed presentation and analysis of the distribution relative to Project infrastructure and activities for caribou and other terrestrial mammals observed during surveys and incidental sightings; d. Results of the annual monitoring program, including field methodologies and statistical approaches used to support conclusions drawn; and e. An assessment and presentation of annual environmental conditions including timing of snowmelt, green-up, as well as standard weather summaries	In Progress	(i) TC56 notes the need for an analysis of the baseline information on caribou distribution relative to the mine. The KivIA suggests that a spatial analysis and mapping using the collared caribou and caribou sightings given the trend to earlier seasonal distribution relative to Meliadine Mine would be helpful for the 2025 Annual Report. In 2024, core calving (50% probability of the 50 collared cows) had an 8% overlap with the Regional Study Area but the 95% probability was within 15km of the mine site, and a few caribou were observed within 5km of the mine site during calving; 3000 caribou were observed within 8km on 16 June (Appendix 26; Appendix K; Appendix J). The KivIA appreciates that Agnico Eagle did add the number of days >20°C to the 2024 Annual Report (Appendix 26; Section 4; Table 5) but the KivIA is surprised that Agnico Eagle does not use a longer run of years to establish annual variation and any trends as the data used is from Rankin Inlet weather station. Recommendation: The KivIA requests that Agnico Eagle undertake a spatial analysis of the HOL sightings, road surveys, camera detections and collar pathways to describe trends in the timing and seasonal distribution of caribou in the vicinity of the mine site and AWAR.
57	Within its annual report to the NIRB, the Proponent shall incorporate a review section which includes: a. An examination for trends in the measured natural variability of Valued Ecosystem Components in the region relative to the baseline reporting; b. A detailed analysis of wildlife responses to operations with emphasis on wildlife behaviour, mortalities and displacements (if any), and responses to operations of the all-weather access road and associated access roads/trails, and the waterlines; c. A demonstration and description of how the monitoring results, including the all-weather access road, and associated access roads/trails, and waterlines contribute to cumulative effects of the project; and d. Any proposed changes to the monitoring survey methodologies, statistical approaches or proposed adaptive management stemming from the results of the monitoring program....	In Progress	The 2024 Annual Report (Appendix 26; Section 12.1) only sampled behavior during post-calving and does not explain why behavior was not monitored during pre-calving (May). The KivIA notes that cameras were not operational until 28 May (their installation was delayed to avoid disturbing caribou, although presumably installation could occur prior to anticipated caribou arrival). The behavior scans of early post-calving caribou (19 June - 3 July) only totalled 17 groups, which is lower than previous years (Appendix 26; Table 28). It is not reported whether the groups included young calves and whether their presence influenced the caribou responses as the 2024 results were combined with previous years. Inter-annual variation should be examined as seasonal distribution changes. We now know that it takes longer for caribou to return to foraging or being bedded after responding to three traffic disturbances compared to a single traffic disturbance: for 3 disturbances in 30 min, most (80%) caribou recover within 15min.





3. Closing

The KivIA appreciates the opportunity to provide comments on the 2024 Annual Report for the Meliadine Project. Please contact Luis Manzo, Director of Lands, (dirlands@kivalliqinuit.ca) should you require more information.

Regards,

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