Kivalliq Inuit Association
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To: Emily Koide
Technical Advisor I, Nunavut Impact Review Board

From: Luis Manzo, Director of Lands, Kivalliq Inuit Association

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Date: June 20, 2022

Re: Review of Agnico Eagle Mines Limited's Meliadine Gold Mine Project 2021 Annual Report; NIRB File No.: 11MN034

1. Introduction

The Kivalliq Inuit Association (KivIA) has conducted a review of the Agnico Eagle Mines Ltd. (Agnico Eagle) 2021 Annual Report for the Meliadine Gold Project. Agnico Eagle's submission consisted of the Meliadine Gold Mine 2021 Annual Report (April 2022) supported by 44 appendices (listed in Appendix 1). These documents were submitted by Agnico Eagle to address requirements within the following authorizations:

- NIRB Project Certificate No. 006 (Amendment No.002);
- KivIA Permit KVCA07Q08;
- KivIA Permit KVCA11Q01;
- KivIA Production Lease KVPL11D01; and
- The Meliadine Inuit Impact and Benefit Agreement (IIBA).

KivIA has completed this review with the support of the following consultants:

- Aurora Wildlife Research (AWR; Kim Poole and Anne Gunn), terrestrial specialists;
- Prairie Scientific Inc. (PSI; Matt McDougall), aquatic environment specialists; and
- GeoVector Management Inc. (GeoVector; Alan Sexton), geoscience specialist.

Our review comments are summarized in Section 2. Full comments and recommendations are provided in Section 3 of this technical memorandum.

2. Summary of Comments

Comments pertaining to the **terrestrial environment** are summarized as follows:

1. Traffic volume along the All-Weather Access Road (AWAR) in 2021 continues to exceed volumes predicted in the FEIS, even without the saline water trucking.

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2. Agnico Eagle should clarify why so many Arctic foxes were at the mine site and why they required euthanizing.
3. Agnico Eagle and the Government of Nunavut need to develop a long-term data share agreement to enable Agnico Eagle to examine collared caribou data in a timely manner, to aid in interpretation of monitoring and mitigation effectiveness.
4. A more comprehensive analysis of collared caribou movements relative to roads and the mines site is required.
5. A more detailed accounting is required of the monitoring surveys and their caribou observations and relate them to the application of the decision tree and site work suspension or road closures.
6. The monitoring method(s) used to identify caribou deflections from AWAR should be clarified.
7. The caribou behaviour study should focus on responses to stopped vehicles and convoys, and separate cow-calf groups from non-calf groups in reporting.
8. The camera study should provide more data on the timing of last vehicles passage relative to caribou crossing, and test he assumption that a caribou within 5 m of the road actually crossed the road.
9. Agnico Eagle should provide greater detail in how it is meeting the Terms and Conditions relative to caribou and other wildlife.
10. Agnico Eagle should integrate incidental sightings, road surveys, behaviour and camera monitoring results with collared caribou data to clearly describe year-round monitoring for caribou and to evaluate the function and validity of the monitoring strategies.
11. Agnico Eagle should work with TAG and Inuit elders to apply IQ principles and knowledge to define deflection of caribou from the AWAR and mine site.

Comments pertaining to the **aquatic environment** are summarized as follows:

1. Agnico Eagle should explore strategies to mitigate nutrient enrichment in the East Basin of Meliadine Lake, including but not limited to increasing the volume of contact water diverted to Itivia Harbour.

Comments pertaining to **geoscience** are summarized as follows:

1. Agnico Eagle should continue to monitor the effectiveness of the current mitigation methods for dusting generated by the Tailings Storage Facility (TSF).
2. Agnico Eagle should characterize the sediment and the method of transport related to dusting from the TSF.
3. The KivIA agrees and strongly supports the consulting engineer's recommendation that the tailings be tested to determine their unfrozen content curve below 0° C to determine how much of the tailings remain frozen.
4. Agnico Eagle should confirm what capacity remains in the current landfill, when a new landfill will be required and where it will be located.

3. Technical Review

3.1 Terrestrial Environment Technical Comments

Meliadine Gold Mine 2021 Annual Report (April 2022)
Comment No. KivIA 1: AWAR traffic levels
Reference: S 10.3 AWAR; Appendix 26 TEMMP report S 12.4.3 Table 23, pg 56; Appendix 33, 2021 AWAR Traffic Data
Comment: The traffic volumes along the All-Weather Access Road (AWAR) in 2021 continue to exceed levels predicted for the AWAR in the FEIS by 115% (more than double) between June and October (S 10.3, Table 27, pg 115). Traffic volumes during July, which coincided with caribou movement through the site, exceeded levels predicted in the FEIS by 71% (S 10.3, Table 27, pg 115) despite the closure of AWAR over 122.5 hours across 10 days and essentially no water tanker traffic that month (Appen. 33, 2021 AWAR Traffic Data).
Recommendation: Agnico Eagle should clarify whether and when traffic volumes predicted in the FEIS will be attained, and if they won't be attained, what implications this has for assessment of impacts of the project on wildlife
Appendix 26 2021 Terrestrial Effects Monitoring and Mitigation Program Annual Report (April 2022)
Comment No. KivIA 2: Arctic fox mortalities
Reference: S 9.5 Incidents and Mortalities
Comment: The majority of mortalities in 2021 were related to trapping of Arctic fox – including 3 from vehicle strikes and ~26 trapped and euthanized after an apparent rabid fox attack (S 9.5, Table 19, pgs 45-46). Sixteen of the foxes were trapped and killed at the mine kitchen or landfill. It is unclear whether waste management practices were responsible for the high numbers of Arctic foxes present and subsequently euthanized at the mine site.
Recommendation: Agnico Eagle should clarify why so many Arctic foxes were at the mine site and why they required euthanizing. The TEMMP should also clarify whether rabies was confirmed among foxes at site.
Comment No. KivIA 3: Collared Caribou Data Share Agreement
Reference: S 12.3 Collared Caribou Inventory
Comment:

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The 2020 Meliadine annual report noted "*A request for access to caribou collar data for this report was submitted to the GN DoE on October 27, 2020. Collar data were not provided to Agnico Eagle at the time this report was completed.*" (2020 annual report, S 12.0, pg 35)". In the 2021 annual report, Agnico Eagle again stated "*A data sharing agreement for caribou collar data with the GN DoE is currently being developed*" (S 12.3, pg 52). Fine-scale collar movements would inform caribou movement patterns in relation to AWAR and vehicle traffic, such as "*Past analysis of collar data interactions with the Mine infrastructure and AWAR indicate no strong local scale deflection effects … (Appendix E in Golder 2021)*". The technical memo Revised Collar Caribou Meliadine AWAR Interactions (NIRB PC NO.006 T&C 44), Golder, 22 April 2022 was completed without the benefit of access to collar data. It is incredulous that Agnico Eagle and the Government of Nunavut Department of Environment have been unable to develop a data share agreement after more than a year of efforts.

Recommendation:

Agnico Eagle and the Government of Nunavut Department of Environment should develop a long-term (for example, life of the mine) data share agreement to enable Agnico Eagle to conduct analysis of collar movements at broad and fine (individual collar trajectories) scales to aid in interpretation of monitoring and mitigation effectiveness at the Meliadine mine.

Comment No. KivIA 4: Collared caribou AWAR report

Reference: S 12.3 Collared Caribou Inventory

Comment:

This section states "Past analysis of collar data interactions with the Mine infrastructure and AWAR in indicate no strong local scale deflection effects although more regional effects have not been assessed" (Appendix E in Golder 2021), which refers to the January 2021 Golder report. The KivIA has commented to NIRB on the revised report released in April 2022 (Golder 2022), finding it equally lacking (KivIA technical memo, Comments on Revised Collar Caribou Meliadine AWAR Interactions, 27 May 2022).

The section also refers to caribou typically entering the Regional Study Area (RSA) in April and leaving sometime between April and October and also lingering from October to March, but the frequency and years when this happened is not explained relative to the 13 of 27 years of presence in the RSA based on the collar data. The report goes on to state "*In consideration of these results, impacts to the Qamanirjuaq herd due to the Project have the potential for limited transboundary effects*" (S 12.3, pg 52). However, it is not just numbers of years that collared caribou are in the proximity of the mine site but also the proportion of the Qamanirjuaq herd that is exposed to the Meliadine and how that relates to "limited transboundary" effects.

Recommendation:

1. Agnico Eagle should consider the comments received on its April 2022 revised collar caribou Meliadine AWAR interactions report, and through consultation with interested parties, conduct a more comprehensive analysis; and

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2. Agnico Eagle should identify the proportion of collars within the Regional and Local Study areas for the years when the collared caribou are within those areas to justify the statement about the limited transboundary effects.
Comment No. KivIA 5: Caribou Advisory
Reference: S 12.4 Caribou Advisory
Comment: Caribou presence was monitored based on collar maps twice a week and ground surveys every 2 days (Level 2) then three times a day (Level 3) for the mine site and AWAR. Caribou numbers within 5 km were used to trigger mitigation according to the decision tree (TEMMP v 4, Fig. 3, pg 38). While Table 22 of the TEMMP report (S 12.4.2, pg 54) summarizes the timing and duration of the mine site and AWAR closures and comments with caribou observations, there are no summaries of the surveys and their observations or the collar maps that integrate into these closures. This lack of detail makes it difficult to assess how effective the monitoring and the triggers for road closures were. The surveys and their observations should be cross-referenced to the behaviour and camera studies to relate the traffic frequency when the road was closed and when the caribou crossings were observed. Without integrating the monitoring, KivIA is uncertain as to how effective the decision trees and the consequent mitigation were.
Recommendation: 1. Agnico Eagle should provide a more detailed accounting of the monitoring surveys and their caribou observations and relate them to the application of the decision tree and site work suspension or road closures. 2. Agnico Eagle should relate traffic frequency from the camera study to road closures and integrate these data with the information on crossings and site work suspension or road closures to estimate mitigation effectiveness.
Comment No. KivIA 6: Impact predictions
Reference: S 12.5 Accuracy of Impact Predictions
Comment: A summary of the impact predictions proposed in the TEMMP was provided in Table 24 (pg 57; and also provided in Table 2, pg 8). Under the monitoring indicator "sensory disturbance", which relates to the threshold of "<10% caribou deflections from AWAR", caribou behaviour monitoring is identified as the appropriate monitoring method. In their response to our comments on the 2020 annual report (letter of 28 July 2021), Agnico Eagle acknowledged that "*30-minute behaviour surveys are unlikely to provide meaningful results that quantify delays and deflections from the AWAR*".
Recommendation:

Agnico Eagle should correctly identify in Tables 2 and 24 which monitoring method will be used to identify caribou deflections from AWAR.
Appendix 27: 2021 Caribou Behaviour Study (January 2022) and TEMMP Report Appendix E
Comment No. KivIA 7: Caribou behaviour
Reference: 2021 Caribou Behaviour Study
Comment: The behavior study started 29 June 2021 within 2 days of large groups of caribou seen passing through the vicinity of the mine (a week earlier than 2020). The report does not mention that calves were initially only about 3 weeks old and thus their cows would be more responsive to disturbance than later in the summer. Peak lactation is about 3 weeks after birth so the cows would be also highly motivated to be foraging. Caribou behavior was measured during 46 30-min bouts from 29 June to 12 July 2021 and 56 bouts during 1–17 July 2020. Results were combined for 2020 and 2021. Responses to disturbances (vehicles, mostly Project pickups and ATVs) were recorded during 55% (56/102) of the sample bouts. Caribou respond to a vehicle with more caribou alert or running; typically, most (50–80%) of the group responded and then resumed their previous behaviour within 6 minutes. Caribou responded less (i.e., less alert behaviour or running) when further than 1,000 m from the road. However, averaging over the 30 min sampling period limited the sensitivity of the analyses and groups sizes were larger further from the road. The type of vehicle did not change the responses nor the number of disturbances. The bouts to record responses to convoys were too few to allow analysis. The study is well-presented and analysed and mostly meets its objective which was to determine if caribou budgets change with distance from the mine and to document caribou response (specifically, distance to AWAR, large vs small groups, and with or without disturbance). In particular, the results on documenting caribou responses can be used to establish, with Terrestrial Advisory Group (TAG) input, qualitative thresholds for the amount of sensory disturbance. For example, as each disturbance could interrupt foraging/lying time by about 6 minute, and a cow spends about 70% her daily activity foraging and lying (ruminating), then a threshold can be estimated to reduce the risk of a cow not gaining enough weight to support her calf and herself. However, sample size was limited partly because the presence of caribou on the road halted most vehicle traffic except quads. KivIA suggests that this could become part of the study – caribou responses to stationary vehicles to determine if it is an effective mitigation technique. Also, the analyses did not separate out bull (non-calf) groups from cow and calf groups, which needs to be tested given the young age of the calves. Although wind speed and temperature did not influence caribou responses, an integrated wind/temperature index to mosquito and warble flies should be tested.
Recommendation: Agnico Eagle should:

1. Continue monitoring behaviour responses but focus on responses to stopped vehicles and convoys;
2. Re-analyze the behaviour data to examine average behaviour within a 30-minute sampling period and separate cow-calf groups from non-calf groups; and
3. Working with TAG, determine how duration of behavioural responses can be used to determine thresholds for sensory responses (in addition to the proposed <10% deflection rates; Table 2, pg 8).

Appendix 28: 2021 Caribou Trail Camera Study (January 2022) and TEMMP Report Appendix F

Comment No. KivIA 8: Camera Study

Reference: Caribou Trail Camera Study

Comment:

The study used 27 cameras taking both timed and motion-triggered photos along the AWAR from mid-June to mid-July 2021. Four cameras within 5 m of the road were specifically to monitor traffic. The cameras recorded caribou over a relatively brief 10-day duration with peak counts of up to 2,000 caribou/day. Caribou were detected more consistently during the day (09:00 to 21:00 hr) than at night in 2021, which KivIA suggests is noteworthy in designing future mitigation. Caribou crossed AWAR at a higher frequency at AWAR Km 22–24, which is consistent with local knowledge, suggesting that the cameras are more useful than caribou collars in identifying where caribou cross the road. Road structure (slope, substrate, height, and surrounding habitat) did not influence caribou crossing the road but the road is relatively uniform along much of its length. Pick-up trucks and quads accounted for almost 2/3 of the traffic; water tanker truck traffic started in August after the cameras were removed (TEMMP Report, Table 23, pg 56). The lag time between a vehicle passage and a caribou crossing (caribou within 5 m of the road and assumed to have crossed) averaged 1 hour 18 minutes. The time was more variable for heavy vehicles than light vehicles and quads.

The 2020 and 2021 camera results met three objectives which were to evaluate a) if caribou use specific locations along the AWAR; b) how road construction (berm material, height and slope) affects caribou crossings; and c) the relationship between vehicles and timing and location of caribou observations. The 4th objective to estimate how the AWAR and site infrastructure contribute to cumulative effects was not addressed. The report was clear, useful and with excellent figures.

Recommendation:

1. Agnico Eagle should continue the camera study but provide greater details on vehicle passage rate (minutes between passages) and timing of last vehicles passage relative to caribou crossing, i.e., table format for the data including numbers and kind (cow-calf or non-calf) of caribou that crossed, and assessment of expected and observed crossing rate based on traffic frequency);
2. Agnico Eagle should provide data that tests the assumption that a caribou within 5 m of the road actually crossed the road;

3. While the camera study is designed to be complementary to the objective of the caribou collaring program (TEMMP Section 4.7), KivIA recommends that Agnico Eagle examine if and how the cameras could also be complimentary with the behaviour study; and
4. Agnico Eagle should discuss with TAG if and how cameras can be used to address cumulative effects.

Appendix 26 2021 Terrestrial Effects Monitoring and Mitigation Program Annual Report (April 2022)

Comment No. KivIA 9: Concordance with Terms of Reference

Reference: TEMMP S 1.2.1

Comment:

KivIA has reviewed Agnico Eagle's progress with the Terms and Conditions of Project Certificate No.006 Amendment No. 002 (March 2022) and finds that further progress is needed:

- The failure to integrate monitoring with the GN's regional caribou collaring program has already been mentioned in the preceding comments.
- KivIA is uncertain without more details as to how the routine wildlife survey data (including caribou) contribute to an understanding of cumulative effects or assist in anticipating large caribou migrations (S 1.2.1, pgs 2-3) without more information on the range of natural (annual) variation.
- Term and Condition (T&C) 45 (Table 1, pg 2) requires that the "*Proponent shall give special consideration for supporting regional studies of population health and harvest programs for Qamanirjuaq caribou*" but KivIA is uncertain about the input and the extent of the regional caribou health programs and seeks clarification about what is meant by health programs and how Agnico Eagle contributes.
- The threshold of not more than 1 Arctic fox project-related mortality was greatly exceeded in 2021. The adaptive management of "*On-going waste management and, regular toolbox meetings reiterating that any disrespect of wildlife or of Meliadine's wildlife policy is unacceptable and against company rules*" (S 9.6, Table 20, pg 47) does not address T&C 55 to ensure monitoring and mitigation for the Project is responsive to undesirable rates of mortality.
- The requirement for a detailed presentation and analysis of the distribution relative to Project infrastructure and activities for caribou (T&C 56) should include more details of the road and site surveys and their integration with the behaviour and camera surveys. T&C 56 also requires information on annual environmental conditions including timing of green-up (which could be based on local observations or satellite imagery).
- While Agnico Eagle met the requirements for T&C 57 (*detailed analysis of wildlife responses to operations with emphasis on wildlife behaviour, and mortalities*), information on displacements and a demonstration and description of how the monitoring results contribute to cumulative effects of the project are needed.

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- T&C 118 specifies weekly winter track surveying and summer and fall surveys undertaken on foot twice per month, but S 12.5 does not provide these data at the monthly scale and doesn't provide them in a format that examines trends throughout the year.

Agnico Eagle uses calcium chloride to mitigate road dust but does not provide observations on whether the calcium is an attractant to caribou or details of whether or not deterrents were required (T&C 119).

Recommendation:

Agnico Eagle should provide greater detail in how it is meeting the Terms and Conditions relative to caribou and other wildlife.

Comment No. KivIA 10: 2021 TEMMP Annual Report objectives

Reference: TEMMP S 1.5, Appendix 29: 2021 Wildlife Observations

Comment:

KiviA's review of caribou monitoring finds that the 2021 TEMMP Annual Report only partly meets its primary objectives (S 1.5, pg 7), which suggests uncertainty about effects of the mine. KivIA identified lack of information about whether three objectives (summary of year-round monitoring strategy, evaluating the function and validity of implemented monitoring strategies, and summarizing adaptive management strategies) were fully implemented. The exposure of caribou to Meliadine is high but there are uncertainties. Most caribou were reported during a brief period in late June to mid-July but incidental caribou sightings included January, September and December (Appendix 29 2021 Wildlife Observations). The extent of monitoring outside the main caribou post-calving migration is not described (TEMMP S 12). The absence of analysis of any collar data is a particular limitation as those data are not only required as part of mitigation thresholds but also are required to describe the timing and extent (proportion of the Qamanirjuaq herd) exposed to the mine and AWAR.

Recommendation:

Agnico Eagle should integrate incidental sightings, road surveys, behaviour and camera monitoring results with collared caribou data to clearly describe year-round monitoring for caribou and to evaluate the function and validity of the monitoring strategies.

Comment No. KivIA 11: Incorporation of Inuit Quajimajatuqangit

Reference: S 3 Inuit Quajimajatuqangit

Comment:

KivIA appreciates Agnico Eagle's efforts to incorporate Inuit Quajimajatuqangit (IQ; S 3; Table 3, Appendix 1) but notes that use of IQ relies on individual quotes. KivIA suggests that a wider approach to relying on IQ would include the principles of IQ as, for example, listed by NIRB (https://www.nirb.ca/inuit-qaujimajatuqangit).

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KivIA suggests, for example, the definition of deflection as a threshold for sensory disturbance (S 2.0, Table 2, pg 8) may benefit from working with Inuit elders and applying IQ principles such as Aajiiqatigiinniq, Ikajuqtigiinniq and Qanuqtuurniq (Decision making through discussion and consensus, Working together for a common cause, and Being innovative and resourceful). KivIA also notes that NIRB has questioned whether taking a different approach to describing deflection is needed (K. Kaluraq, NIRB Chairperson, NIRB Public Hearing File No.: 11MN034 Transcript, Vol. 4, June 17, 2021 at pp. 653-654, lines 16-26 and 1-13). Currently, deflection is the only threshold for sensory disturbance of caribou (Table 2), which is why KivIA is recommending a different approach to its definition.
Recommendation: Agnico Eagle should work with TAG and Inuit elders to apply IQ principles and knowledge to define deflection of caribou from the AWAR and mine site.
Appendix 31: 2021 Tundra Restoration and Natural Recovery Monitoring Report
Comment No. KivIA 12: Tundra restoration
Reference: Appendix 31
Comments: KivIA thanks Agnico Eagle and the University of Saskatchewan for their collaboration in undertaking such a useful series of studies (2018-2021) and their recommendations for reclamation. The studies are designed to contribute to Term and Condition no. 41("...a progressive re-vegetation program for disturbed areas"). The report described how exploration drilling since the 1990s and on-going exploration have left hundreds of drilling waste sites averaging ~200 m^2 in size and typically with shallow sumps that have been filled with drilling wastes (ground rock, mud and additives). The recovery of vegetation on exploration drilling waste showed natural recovery after 20-25 years and the rate of recovery depended on depth of the drilling waste and availability of nearby vegetation, both of which are the basis for recommendations. Other studies with both laboratory and field-testing demonstrated the use of turfs (blocks of intact tundra) for active in-situ remediation. Unfortunately, we could not find where this work leads into plans for reclamation of the mine site. The research was to include working with youth and local community engagement in Rankin Inlet and Baker Lake but COVID delayed the outreach programs.
Recommendations: 1. Agnico Eagle should ensure that future exploration drilling follow the report recommendations to support natural vegetation recovery at drilling sites. 2. Agnico Eagle should involve the TAG in reviewing the studies and how their results can be applied to reclamation at Meliadine.

3.2 Aquatic Environment Technical Comments

Meliadine Gold Mine 2021 Annual Report (April 2022)
Comment No. KivIA 13: Nutrient Enrichment in Meliadine Lake
Reference: S 7.1.2, 7.1.4, 7.1.6, 7.1.7; Appendix 18 S 4.5.3, S 6.4.3; AEMP Design Plan S 8.4.2
Comment: As set out by the AEMP Design Report, 2016, the Low Action Levels for Nutrient Enrichment in Water quality are as follows: Concentrations of nutrients in the NF area above the normal range, Concentration exceeds a defined percentage of AEMP benchmark, and Divergence of Trends in comparison to reference areas. Total Phosphorus measured at the NF sites in 2021 average 0.00731 mg/L, which is a significant increase from baseline measurement and within error of the 0.0075 mg/L Action Level. Of 23 measurements taken from March to September, 2021, 14 exceeded the 0.0075 mg/L benchmark. Further, Figure 4-8, Appendix 18 suggests that total phosphorus concentrations at the Near and Mid Field sites do not follow the same trend as the Mel-03 Reference sites from 2016 on. Chlorophyll-a concentrations at the NF sites have also increased relative to baseline in trends not present at the Reference sites. Increases in size of Threespine Stickleback relative to reference may also suggest an increase in primary productivity in the East Basin. These increases, though not yet exceeding the Action Levels, are indicative of increasing nutrient enrichment of the East Basin.
Recommendation: Agnico Eagle should amend the statement in S 7.1.4 to acknowledge that phosphorus concentrations have increased over time in the East Basin of Meliadine Lake. Agnico Eagle should explore strategies to mitigate the impact of nutrient enrichment in the East Basin, including but not limited to increasing the volume of contact water diverted to Itivia Harbour.

3.3 Geoscience Technical Comments

Appendix 6 2021 Annual Geotechnical Inspection Report
Comment No. KivIA 14: Tailings Storage Facility
Reference: Appendix 6, S 6.5 Dusting from the TSF on WRSF1
Comment: This section states "*There is a plan in place to reduce dusting from the TSF. This includes a deposition plan to limit the time that placed tailings are exposed prior to being covered by fresh tailings. Watering of the tailings will be used for tailings that cannot be covered for some time.*"

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This section also states *"There is sediment along the toe of the TSF which could be fines from the waste rock cover on the TSF or from the uncovered tailings material. Transport of tailings could be from dusting or possible migration of fines from the dry stack into the perimeter rock fill of the TSF. It is recommended that some investigation be done to characterize the sediment and the method of transport".*
Recommendation: Agnico Eagle should continue to monitor the effectiveness of the current mitigation methods for dusting, and should characterize the sediment and the method of transport related to dusting from the TSF.
Comment No. KivIA 15: Tailings Storage Facility
Reference: Appendix 6, Executive Summary & Appendix 8
Comment: This section states *"It is recommended that the tailings be tested to determine their unfrozen content curve below 0° C to determine how much of the tailings remain frozen."*
Recommendation: This work is expected to be potentially implemented in Q4, 2022. The KivIA strongly recommends that this testing be implemented in Q4, 2022.
Comment No. KivIA 16: Landfill Capacity
Reference: Appendix 6, Executive Summary
Comment: This section states *"The landfill is nearing its current capacity."*
Recommendation: Can AEM confirm what capacity remains in the current Landfill, when a new landfill will be required and where it will be located?

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4. Closing

KivIA appreciates the opportunity to provide comments on the 2021 Annual Report for the Meliadine Gold Project. Please contact Luis Manzo, Director of Lands, should you require more information.

Regards,

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