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Programme de protection du poisson et de son habitat  
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June 20, 2025

*Your file*      *Votre référence*  
NIRB 125515 / 11MN034

*Our file*      *Notre référence*  
11-HCAA-CA7-00014

Nunavut Impact Review Board  
Attn: Keith Morrison  
Manager, Project Monitoring  
PO Box 1360 (29 Mitik Str.)  
Cambridge Bay, NU  
X0B 0C0

Via email to : [info@nirb.ca](mailto:info@nirb.ca)

**Subject: Comment Request for Agnico Eagle Mines Limited's Meliadine Gold Mine Project 2024 Annual Report**

Dear Keith Morrison,

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your request for comments on May 23, 2025. DFO has reviewed the above 2024 Annual Report in regards to its mandate, i.e. the management, protection and conservation of fish and their habitats. The Nunavut Impact Review Board (NIRB) invited parties to respond to the following topics:

1. Effects monitoring:
  - a) Whether the conclusions reached by Agnico Eagle Mines in the 2024 Annual Report are valid; and
  - b) Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.
2. Compliance monitoring:
  - a) Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically;
    - i. Identify the terms and conditions from the Project Certificate which have been incorporated into any permits, certificates, licences or other approvals issued for the Project, where applicable;
  - b) A summary of any inspections conducted during the 2024 reporting period, and the results of these inspections; and

- c) A summary of Agnico Eagle's compliance status with regards to authorizations that have been issued for the Project.

Specifically, DFO has reviewed the following:

- Meliadine Gold Mine 2024 Annual Report
- Appendix 3 – 2025-2026 Mine Plan
- Appendix 5 – Water Balance and Water Quality Modeling;
- Appendix 6 – Annual Geotechnical Inspection Report
- Appendix 7 – 2023 Annual Geotechnical Report Agnico Eagle Responses and Action Table
- Appendix 8 – 2024 Annual Geotechnical Report Agnico Eagle Responses and Action Table
- Appendix 15 – 2024 Reportable Spills;
- Appendix 16 – 2024 Non-Reportable Spills;
- Appendix 18 – 2024 Aquatic Ecosystem Monitoring Program (AEMP) Report;
- Appendix 22 – 2024 Blast Monitoring Memo;
- Appendix 28 – 2024 Marine Mammal and Seabird Observation Report; and
- Appendix 29-08 – Interim Closure and Reclamation plan
- Appendix 29-13 – Roads Management Plan
- Appendix 29-14 – Sediment and Erosion Management Plan
- Appendix 29-15 – Shipping Management Plan
- Appendix 29-16 – Spill Contingency Plan
- Appendix 28-18 – Water Management Plan
- Appendix 29-19 – Water Quality and Flow Monitoring Plan
- Appendix 29-20 – Adaptive Management Plan for Water Management
- Appendix 29-21 – Aquatic Effects Monitoring Program (AEMP) Design Plan
- Appendix 29-23 – Environmental Management and Protection Plan
- Appendix 29-24 – Freshet Management Plan
- Appendix 30 – NIRB Project Certificate Tracking Table
- Appendix 31 – NWB Water Licence Tracking Table
- Appendix 32 – 2023 Annual Report Comments Tracking Table
- Appendix 33 – DFO Reporting Tracking Table

Performance on Project Certificate 006 Terms & Conditions 30 to 34 (Freshwater Aquatic Environment); and 76 to 86 (Marine Environment) were incorporated under DFO's review of the 2024 Annual Report.

DFO provides the following comments for the NIRB's consideration:

1. Effects Monitoring:

- a. Whether the conclusions reached by Agnico Eagle Mines in the 2024 Annual Report are valid;

DFO is generally agreeable with Agnico Eagle Mine's reporting.

- b. Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.

DFO has the following comments or concerns to provide at this time related to effects monitoring.

<b>Comment Number:</b>	DFO-1
<b>Subject/Topic:</b>	Hydrological monitoring of Meliadine Lake and it's Outflow.
<b>References:</b>	Annual Report Section 3.2.5 Meliadine Lake Outflow Monitoring; Appendix 18 – 2024 Aquatic Effects Monitoring Program (AEMP) Report; Appendix 29-19 – Water Quality and Flow Monitoring Plan.
<b>Comment:</b>	<p>Hydrologic monitoring of water levels in Meliadine Lake, and flows at the 2 outlets of Meliadine Lake, began late in the open water season of 2024.</p> <p>Information provided in the 2024 Annual Report related to this hydrological monitoring was limited due to the late start of the monitoring program. It is planned for this information to be included in the 2025 Annual Report.</p> <p>It is unclear how this information will be reported and incorporated into the overall environmental management system in place at the Meliadine Mine. It is common place for a mines Aquatic Effects Management Program (AEMP) to include a hydrological component, which also allows for regular evaluation and potential response actions if detrimental effects are observed. Alternatively, the Meliadine mines Water Quality and Flow Monitoring Plan complements the AEMP.</p> <p>DFO would ultimately like to better understand some of the details of this monitoring program sooner than the submission of the 2025 Annual Report, including:</p> <ul style="list-style-type: none"> <li>• what historical data is available and will be used for long term comparison,</li> <li>• the location where will this information be reported,</li> <li>• how mine related changes in water level will be responded to if determined to be detrimental to fish or fish habitat.</li> </ul>
<b>Conclusion/Request:</b>	Proponent to provide additional details on the hydrological monitoring, including:

	<ul style="list-style-type: none"> <li>• what historical data is available and will be used for long term comparison,</li> <li>• the location where will this information be reported,</li> <li>• how mine related changes in water level will be responded to if determined to be detrimental to fish or fish habitat.</li> </ul> <p>To consider the analysis and reporting of this hydrology data under the AEMP, Water Quality and Flow Monitoring Plan, or provide rationale for another appropriate location.</p>
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<b>Comment Number:</b>	DFO-2
<b>Subject/Topic:</b>	Catch per unit effort (CPUE).
<b>References:</b>	Appendix 18 – 2024 Aquatics Effects Monitoring Program AEMP report.
<b>Comment:</b>	Catch per unit effort (CPUE) data can provide a loose measurement of fish abundance, and when collected and compared over a times series, can provide information on changes in fish abundance. CPUE data is being collected and provided in section 8.4.1 of Appendix 18 – 2024 Aquatics Effects Monitoring Program AEMP report, of the 2024 Annual Report. For small bodies fish, this is the third year of data collection, for large bodied fish this is the second year of data collection, however the report only provides data from 2024. Providing historical data in conjunction with current data would allow for this historical comparison.
<b>Conclusion/Request:</b>	Proponent to provide each years CPUE data in the annual report so that comparison can be made between years.

<b>Comment Number:</b>	DFO-3
<b>Subject/Topic:</b>	Shipping within the 2 km buffer of Marble Island.
<b>References:</b>	2024 Annual Report section 7.9.2; Appendix 29-15 – Shipping Management Plan
<b>Comment:</b>	The Shipping Management Plan indicates that shipping vessels must follow a setback distance of 2 km from Marble Island. The 2024 Annual Report indicates that “Groupe Desgagnés and/or Woodward vessel tracks crossed through the 2 km setback polygon at Marble Island on three occasions,” but does not provide explanation for these occurrences.

<b>Conclusion/Request:</b>	For Proponent to provide explanation as to why this 2 km buffer was entered and how it will be prevented in the future.
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<b>Comment Number:</b>	DFO-4
<b>Subject/Topic:</b>	Marine Mammal Monitoring Program
<b>References:</b>	Annual Report Section 7.9.2 Marine Environment; Appendix 27: Meadowbank and Meliadine Mines Marine Mammal and Seabird Report, 2024
<b>Comment:</b>	<p>Appendix 27: Meadowbank and Meliadine Mines Marine Mammal and Seabird Report, 2024, indicates that Marine Mammal Monitoring survey efforts in 2024 were conducted at an effort of one to three surveys being completed daily, lasting 1.5-2 hours per survey. The report does not indicate how often only one survey was being conducted daily. One survey daily is not sufficient for effective marine mammal monitoring.</p> <p>Increasing this to a minimum of 2 separate surveys per day, each lasting 1.5-2 hours, would significantly increase the effectiveness of this monitoring.</p>
<b>Conclusion/Request:</b>	For Proponent to increase the minimum effort of marine mammal monitoring to two (2) surveys per day.

<b>Comment Number:</b>	DFO-5
<b>Subject/Topic:</b>	Aquatic Invasive Species
<b>References:</b>	Shipping Management Plan (Version 4); 38 - 2022 Annual Report Comments Tracking Table; Appendix 30 – NIRB Project Certificate Tracking Table.
<b>Comment:</b>	<p>The introduction of Aquatic Invasive Species (AIS) to shipping ports of the arctic remains a serious concern for DFO. It is understood that AEM contracts independent shipping companies, which are themselves largely responsible for regulation and compliance. However, as it stands there is no monitoring program or response plan for aquatic invasive species associated with the shipping related to the AEM mining activities.</p> <p>There is a risk of introducing aquatic invasive species through haul contamination and ballast water exchange from ships coming from other regions. The Shipping Management Plan requires the shipping companies contracted to supply the Meliadine Mine through the annual sea-lift operations to comply with the Ballast Water</p>

	Regulations, which reduces the risk of invasive species being introduced as a result of shipping activities, but does not eliminate this risk. Monitoring for the detection of aquatic invasive species would be required for AIS detection, and the development of a AIS Monitoring and Management Plan would be a good first step towards appropriate AIS mitigation.
<b>Conclusion/Request:</b>	Proponent to work with DFO to develop a AIS Monitoring and Management Plan that includes monitoring for AIS detection in alignment with the degree of risk from shipping activities.

<b>Comment Number:</b>	DFO-6
<b>Subject/Topic:</b>	Underwater Noise
<b>References:</b>	Shipping Management Plan / MMSO / Noise Monitoring; 38 - 2022 Annual Report Comments Tracking Table
<b>Comment:</b>	<p>Underwater noise from shipping vessels has the potential to elicit disturbance effects on marine mammals by reducing their ability to travel, communicate, and find food. This issue remains a concern for DFO.</p> <p>During the 2024 shipping season, 16 vessel trips served the Meliadine project. We currently do not know what noise level and characteristic is produced by those shipping vessels and the potential impact on marine mammals.</p> <p>The FEIS predicted the residual environmental effect of a change in marine mammal behaviour as a result of Project vessel noise was considered to be low in magnitude, however the likelihood of behavioural disturbance from Project-related vessel noise was considered likely. There is currently no monitoring of noise levels to help understand and mitigate these effects.</p>
<b>Conclusion/Request:</b>	Proponent to provide any data or models developed by the proponent or contracted shipping company. DFO to continue working with the Proponent to monitor and model their noise footprint using expert support. This model should aim at evaluating the impact of shipping noise on marine mammals present on the shipping route. A Shipping Management Plan should be updated according to the model.

<b>Comment Number:</b>	DFO-7
<b>Subject/Topic:</b>	Culverts Repair and Installation
<b>References:</b>	Annual Report Section 2.2.1 Culvert repairs work update
<b>Comment:</b>	<p>A total of six culverts along the All Weather Access Road (AWAR), Rankin Inlet Bypass Road (RIBR), and Exploration (EXPLO) roads have previously been identified as being undersized for flow, showing signs of erosion.</p> <p>Under DFO file # 23-HCAA-02631, AWAR 10 was installed in the winter of 2024 and due to delays and work proceeding under DFO file # 24-HCAA-01238 that culvert 7 on the AWAR will not be installed. Culvert RIBR 11 has not yet been installed, and is planned for 2025.</p> <p>Under DFO file # 24-HCAA-02901, two additional culverts were identified as needing replacement (AWAR 8.8, EXPLO 1.1) and one new culvert needing installation (AWAR 15.4). These culvert installations are planned for 2025.</p> <p>These issues were identified in 2023, and are blocking flow causing ponding of water at identified locations. In 2024 this resulted in a discharge of water containing elevated TSS at location AWAR 8.8 as described in Spill Report # 2024-463.</p> <p>DFO would like to know when these culverts are planned for installation and looks forward to receiving the final design reports under the Water Licence process.</p>
<b>Conclusion/Request:</b>	Proponent to confirm when culvert installation is planned for in 2025.

2. Compliance monitoring:

- a) Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically;
  - Identify the terms and conditions from the Project Certificate which have been incorporated into any permits, certificates, licences or other approvals issued for the Project, where applicable;
    - In 2024, there were no terms and conditions taken from the Project Certificate that were incorporated into permits, certificates, licences or other approvals issued for the Project.
- b) A summary of any inspections conducted during the 2024 reporting period, and the results of these inspections; and

- No site visits were conducted in 2024.
- c) A summary of Agnico Eagle's compliance status with regards to authorizations that have been issued for the Project.
  - The proponent is largely compliant with the terms and conditions that pertain to DFO's mandate but is required to address fish passage issues. DFO will continue to work with the proponent to ensure compliance.

If you have any questions with the content of this letter, please contact Derek Donald by phone at 403-827-6781, or by email at [Derek.Donald@dfo-mpo.gc.ca](mailto:Derek.Donald@dfo-mpo.gc.ca). Please refer to the file number referenced above when corresponding with the Program.

Sincerely,



Jennifer Loughery  
Senior Biologist  
Fish and Fish Habitat Protection Program  
Fisheries and Oceans Canada

CC:  
José Audet-Lecouffe, Fisheries and Oceans Canada  
Derek Donald, Fisheries and Oceans Canada