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Sent: June 23, 2025 8:30 AM
To: nirb info <info@nirb.ca>
Subject: [EXTERNAL] Transport Canada comments for 2024 Annual Report - Meliadine Mine

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) Meliadine Gold Mine Project 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 Meliadine Gold Mine Project 2024 Annual Monitoring Report cover four topic areas:

1. Marine safety and security
2. Navigation protection
3. Civil aviation (Meliadine mine flights)
4. Transportation of Dangerous Goods (TDG)

1. **Marine Safety**

Comment Number:	TC-01
Subject/Topic:	Marine Transportation Oil Handling Facility
References:	2024 Annual Report, Section 10.4: Maritime Transportation 2024 Annual Report, Appendix 29-11
Comment: Gap/Issue <ul style="list-style-type: none">• 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 Meliadine Mine facility meets the requirements of the Marine Transportation

<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 	<p>Security Regulations and remains in compliance. The certificate for 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 – 2024 Annual Notice to Mariners
References:	2024 Annual Report, Section 10.4: Maritime Transportation
<p>Comment:</p> <ol 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 2024 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 29-15 Shipping Management Plan (Version 10, March 2025)

<p>Comment: Gap/Issue</p> <ul style="list-style-type: none"> 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 2023 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" (at: https://www.wcdn.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. Navigation Protection

Comment Number:	TC-04
Subject/Topic:	Permits – Navigation Protection Program
References:	2023 Annual Report, Section 10.1: Active Permits – Table 29
Comment: Gap/Issue <ul style="list-style-type: none">Disagreement with the Annual Report conclusionReasons for disagreement with the Annual Report conclusionDisagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix	<p>Regarding the following two approvals issued by Transport Canada's Navigation Protection Program (NPP) for the Project:</p> <ul style="list-style-type: none">2010-600573 - Bridge Meliadine River2019-600003 – Outfall/diffuser, Melvin Bay <p>NPP received no complaints about navigation related to the project in 2024 and did NPP did not carry out any inspections related to these approvals in 2024.</p> <p>NPP was on-site in August 2024 to conduct navigability assessments of the waterbodies slated for dewatering in the 2025-2026 seasons as part of the expansion of the mine. Transport Canada's review of their navigability is on-going.</p>
Conclusion/Request	None.

3. Civil Aviation

Comment Number:	TC-05
Subject/Topic:	Mine aerodrome
References:	NIRB Project Certificate No. 006 Term and Condition #70
Comment: Gap/Issue	<ul style="list-style-type: none">Term and Condition #70 deals with flight altitudes to and from the Meliadine Mine aerodrome. Transport Canada did not receive any complaints related to this aerodrome in 2024.

<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Transport Canada did not conduct any site inspections or enforcement activities related to the Meliadine Mine aerodrome in 2024.
Conclusion/Request	None.

4. Transportation of Dangerous Goods (TDG)

Comment Number:	TC-06
Subject/Topic:	Transportation of Dangerous Goods (TDG) / Hazardous Materials
References:	2024 Annual Report, Section 5 - Waste Management Activities
Comment: Gap/Issue <ul style="list-style-type: none"> 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 Meliadine Mine site by Transport Canada's TDG group in 2024. No complaints / concerns regarding TDG were received by Transport Canada and the Department did not undertake any enforcement actions.
Conclusion/Request	None.

Comment Number:	TC-07
Subject/Topic:	Transportation of Dangerous Goods / Hazardous Materials

References:	<p>2024 Annual Report, Section 6.1.1.3 – Hazardous and non-hazardous waste</p> <p>2024 Annual Report, Appendix 13 – Shipping Documentation</p>
<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>Appendix 13 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 were included with the annual report rather than simply a summary.</p>
Conclusion/Request	<p>Transport Canada requests that NIRB bring this to AEM's attention.</p>

Comment Number:	TC-08
Subject/Topic:	Transportation of Dangerous Goods / Hazardous Materials
References:	2024 Annual Report, Section 10.2 Inspections and Compliance Reports
<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. 108 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 the Department has been provided with the required information and that the non-compliance issues noted in the inspection report have been addressed.</p>
Conclusion/Request	None.

Please follow-up with me if you have any questions about Transport Canada’s review of the 2024 Annual Report for the Meliadine Mine.

Regards,

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