



	<p>mg/L, slightly above the Action Level. Concentrations also exceeded the AEMP Benchmark (0.01 mg/L) at MEL-01 on at least one occasion.</p> <p>While the report notes that total phosphorus concentrations are naturally elevated in Meliadine Lake, observed concentrations approach or exceed thresholds identified for early warning and, in some cases, exceed the 50% increase above baseline (0.009 mg/L) used in the CCME framework to identify potential ecological change. These observations warrant continued scrutiny in the context of reported increases in primary productivity.</p>
Conclusion/Request:	<p>The KivA recommends Agnico Eagle continue to monitor total phosphorus concentrations in Meliadine Lake following commissioning of the waterline to Itivia Harbour. Should prioritized discharge in the Adaptive Management Plan fail to address these increasing total phosphorous concentrations, Agnico Eagle should explore other mechanisms to limit nutrient loading into Meliadine Lake.</p>

Comment Number:	KivIA - 11
Subject/Topic:	Trends in Reference Lakes
References:	Appendix 18 (AEMP), Section 2.3.2, Table 2-3; Section 3.4.4, Table 3-8
Comment:	<p>The structured reference lake monitoring program was initiated in 2025 as a three-year study to assess regional water quality trends and acknowledges that the current dataset is limited and intended to provide semiquantitative context.</p> <p>Despite these limitations, the report interprets differences between 2021, 2024, and 2025 as evidence of temporal change and regional trends. However, data from 2021 and 2024 were collected under separate programs (EEM). As a result, these discrete sampling events cannot be reliably combined to infer temporal trends in the absence of consistent year-over-year sampling.</p> <p>This inconsistency is particularly important because the reference lake data are used to support broader conclusions regarding regional drivers of water quality change, including for metals such as copper. Interpreting differences between non-comparable datasets as temporal change may bias the weight-of-evidence assessment by overstating regional trends and reducing the ability to distinguish mine-related effects from background variability.</p>



References:	2025 SEMR
Comment:	<ol style="list-style-type: none"> 1. Limited Advancement & high turnover 2. The report documents substantial expansion of recruitment outreach, training access, and employment engagement activities; however, Inuit workforce participation remains near ~10% overall while turnover remains substantially above industry benchmarks Inuit employees remain underrepresented in skilled trades, technical roles, supervisory positions, and management, indicating a structural “pipeline bottleneck” in upward mobility rather than recruitment alone. While employment activity and hiring initiatives continue to expand, persistently high Inuit turnover and limited progression into skilled and supervisory roles indicate ongoing instability in long-term workforce integration. 3. While employment activity and hiring initiatives continue to expand, persistently high Inuit turnover and limited progression into skilled and supervisory roles indicate ongoing instability in long-term workforce integration. Again, there is a reliance on using existing structural barriers (e.g., education attainment or work readiness) as key reasons for low completion rates and Inuit advancements. Rather than a systemic review of AEM’s own effectiveness. There is insufficient discussion on contractors’ activities and work to hire, train, retain and advance Inuit.
Conclusion/Request:	<p>Review and improvement of current employee upskilling, and employee readiness training programs to support a better understanding of the future potential of mine sites.</p> <p>Provide solutions to improving Contractors’ activities and efforts to improve Inuit employment at the sites.</p> <p>Confirm the number of Inuit employees who have developed a Career development plan with their supervisor.</p> <p>Confirm the number of supervisors who have been trained to complete a career development plan with their Inuit employees.</p> <p>Confirm the participants in the RISE program and their specific turnover rate.</p>



