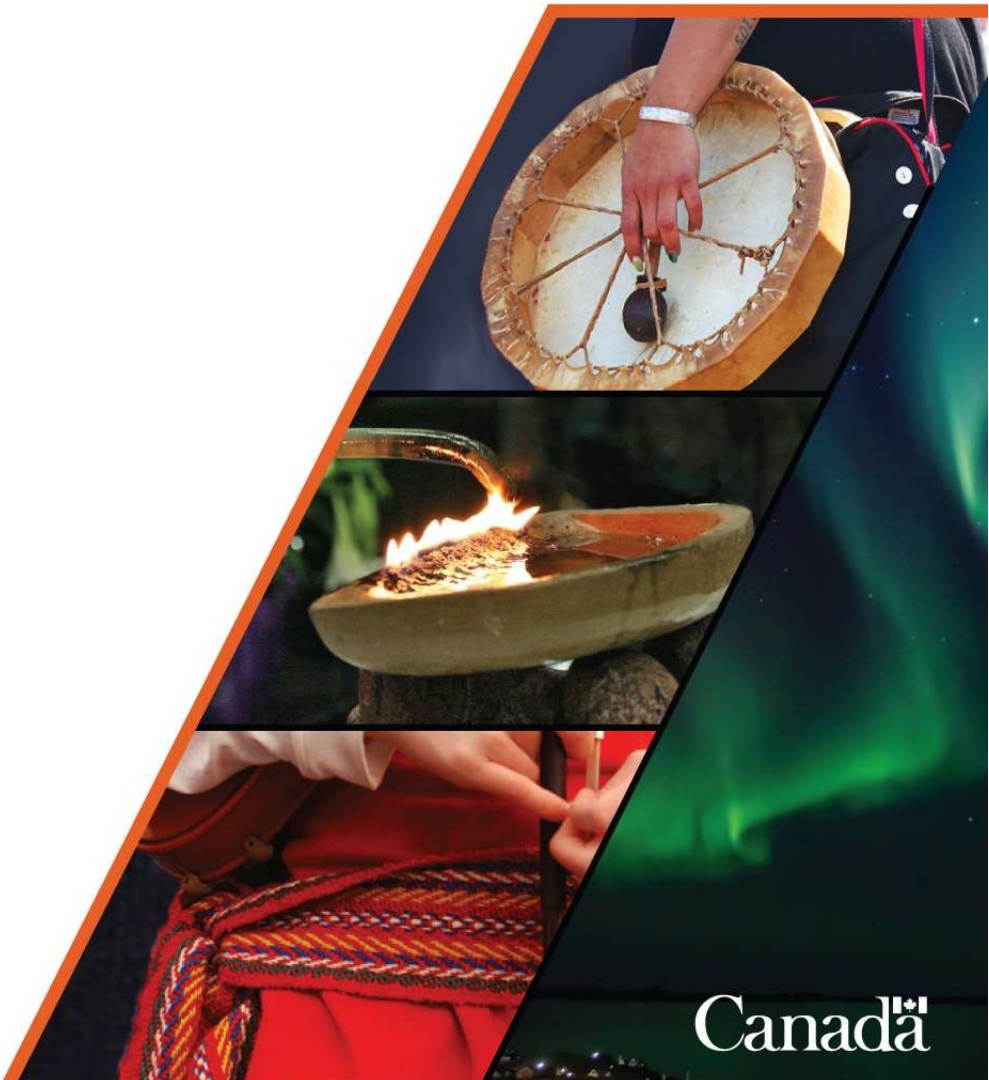
CIRNAC Comments to NIRB Re: Agnico Eagle Mines Limited's Meadowbank Complex Project 2025 Annual Report



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, Nunavut, X0A 3H0

Your file - Votre référence
03MN107 and 16MN056
Our file - Notre référence
GCdocs# 147677666

June 12, 2026

Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board
29 Mitik Street, P.O. Box 1360
Cambridge Bay, Nunavut, X0B 0C0
via email at info@nirb.ca

Re: Comment Request for Agnico Eagle Mines Limited's Meadowbank Complex Project 2025 Annual Report

Dear Keith Morrison,

On April 27, 2026, the Nunavut Impact Review Board (NIRB) requested parties to review and provide comments on Agnico Eagle Mines (AEM) Limited's Meadowbank Complex Project 2025 Annual Report for effects and compliance monitoring, pursuant to Section 12.7.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty The Queen in Right of Canada* (Nunavut Agreement), s. 135(4) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14 (NuPPAA), the amended Meadowbank Gold Mine Project Certificate No. 004, and the amended Whale Tail Pit Project Certificate No. 008.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the 2025 Annual Report and related documents for effects and compliance monitoring, according to its mandated responsibilities and jurisdiction, and has provided comments for NIRB's consideration.

CIRNAC appreciates the opportunity to review AEM's Meadowbank Complex Project 2025 Annual Report and looks forward to working with the NIRB and AEM through any future reviews for these projects. Should you have any questions, please do not hesitate to contact Muhammad Arslan or David Abernethy by email at muhammad.arslan@rcaanc-cirnac.gc.ca or david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,

Richard Bingley
Manager, Impact Assessment

1. ***Effects Monitoring***

CIRNAC reviewed the 2025 Annual Report to assess measurable effects to valued components under its mandate against the potential effects that were predicted from the proposed development of the Meadowbank Gold Mine and Whale Tail Pit Projects, taking into account their respective Final Environmental Impact Statements (FEIS), previous years' monitoring reports, and the requirements included in the Project Certificates (as amended). This assessment considered the following:

a. ***Whether the conclusions reached by AEM in the 2025 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.***

CIRNAC did not identify information under its mandate and jurisdiction that would invalidate the conclusions reached by AEM in the 2025 Annual Report, but has identified information that warrants further clarification. CIRNAC has provided the NIRB and AEM with the following comments for consideration.

Comment Number:	**CIRNAC #1**
Subject:	Whale Tail Water Quality Trends
References:	• Meadowbank Complex 2025 Annual Report • Appendix 26 – Core Receiving Environment Monitoring Program (CREMP) Report • Appendix 14 – Whale Tail Water Management Plan • NIRB Project Certificate No. 008, Amendment No. 001: Term & Condition 17 and 8
Comment:	The 2025 CREMP identified statistically significant increases in several water quality parameters within portions of the Whale Tail receiving environment, including conductivity, hardness, major ions, nutrients, lithium, and related indicators. While the observed concentrations generally remain below applicable environmental quality guidelines and the AEMP concludes that effects remain within the range predicted during the environmental assessment, the trends appear to be becoming more pronounced at several monitoring stations. The Annual Report indicates that these changes are attributable to mine-related influences and remain low in magnitude. However, the report provides limited discussion regarding the long-term trajectory of these trends, the extent to which they are stabilizing versus continuing to increase, and the implications for future adaptive management decisions.
Conclusion/Request:	CIRNAC recommends that AEM: a) Summarize temporal trends for the principal water quality parameters exhibiting statistically significant increases within the Whale Tail receiving environment; b) Discuss whether the observed trends are stabilizing, increasing, or declining relative to previous monitoring periods;

Comment Number:	CIRNAC #1
	c) Describe any adaptive management measures currently being considered to address these trends should they continue to increase in future years.

Comment Number:	CIRNAC #2
Subject:	Whale Tail Productivity Indicators
References:	• Appendix 26 – CREMP Report • Meadowbank Complex 2025 Annual Report • NIRB Project Certificate No. 008, Amendment No. 001: Term & Condition 23 and 19
Comment:	The 2025 CREMP identified elevated nutrient concentrations and increased phytoplankton biomass at several monitoring locations within the Whale Tail receiving environment. Although the observed increases were not statistically significant and did not exceed adaptive management thresholds, they may represent early indications of increased aquatic productivity associated with mine-related nutrient inputs. The Annual Report concludes that no adverse ecological effects have been identified; however, additional information regarding the relationship between observed nutrient trends and productivity indicators would assist reviewers in evaluating the significance of these observations.
Conclusion/Request:	CIRNAC recommends that AEM: a) Summarize observed relationships between nutrient concentrations and phytoplankton biomass trends within the Whale Tail receiving environment; b) Discuss whether the observed productivity indicators remain within the range anticipated during the environmental assessment.

Comment Number:	CIRNAC #3
Subject:	Mill Seepage and Groundwater Management
References:	• Meadowbank Complex 2025 Annual Report • Appendix 35 – Meadowbank Groundwater Monitoring Report • NIRB Project Certificate No. 004, Amendment No. 003: Term & Condition 8
Comment:	The Annual Report indicates that seepage associated with the Assay Lab Road area continues to be monitored and managed through existing water management infrastructure. The issue has been the subject of previous investigations, monitoring programs, corrective measures, and engineering evaluations. AEM has reported that seepage remains contained within the site contact water management system and that corrective measures have been implemented. Given the long duration of this issue and the continued need for monitoring and management, additional information would assist reviewers in evaluating the effectiveness of the corrective measures and the status of the long-term solution.
Conclusion/Request:	CIRNAC recommends that AEM: a) Provide an update on implementation of the long-term corrective measures developed for the Assay Lab Road seepage issue;

Comment Number:	CIRNAC #3
	b) Summarize monitoring results collected since completion of the most recent corrective actions.

Comment Number:	CIRNAC #4
Subject:	Adaptive Management Response to CREMP Trigger Exceedances
References:	• Appendix 26 – CREMP Report • Meadowbank Complex 2025 Annual Report • NIRB Project Certificate No. 008, Amendment No. 001: Terms & Conditions 19 and 8
Comment:	Several water quality parameters within the Whale Tail receiving environment exceeded CREMP trigger levels or exhibited statistically significant increases relative to baseline conditions during 2025. Although adaptive management thresholds were not exceeded and no adverse ecological effects were identified, the observed results demonstrate that measurable mine-related effects continue to occur within portions of the receiving environment. Additional information would assist reviewers in understanding how these monitoring results are being incorporated into adaptive management decision-making.
Conclusion/Request:	CIRNAC recommends that AEM: a) Identify any management actions, investigations, or monitoring modifications considered as a result of the observed trigger exceedances; b) Discuss whether any refinements to existing trigger levels, action thresholds, or monitoring programs are being considered.

Comment Number:	CIRNAC #5
Subject:	Waste Rock Geochemical Characterization and Acid Rock Drainage and Metal Leaching (ARD/ML) Monitoring
References:	• Appendix 17 – Meadowbank Waste Rock and Tailings Management Plan • Appendix 18 – Whale Tail Waste Rock Management Plan • NIRB Project Certificate No. 008, Amendment No. 001: Terms & Conditions 7 and 8 • NIRB Project Certificate No. 004, Amendment No. 003: Term & Condition 15
Comment:	The Annual Report indicates that geochemical characterization and ARD/ML monitoring programs continue to be implemented for waste rock and construction materials. Ongoing characterization is important for confirming assumptions regarding material behaviour and supporting adaptive management of mine wastes. While no significant concerns were identified during the reporting period, additional information would assist reviewers in evaluating whether recent monitoring results remain consistent with previous predictions.

Comment Number:	CIRNAC #5
Subject:	Waste Rock Geochemical Characterization and Acid Rock Drainage and Metal Leaching (ARD/ML) Monitoring
Conclusion/Request:	CIRNAC recommends that AEM: a) Summarize significant geochemical characterization results obtained during 2025; b) Identify any notable changes in ARD/ML classification or material management practices arising from recent monitoring results; and, c) Confirm whether observed geochemical performance remains consistent with previous predictions and management assumptions.

Comment Number:	CIRNAC #6
Subject:	Spill Trends and Preventative Measures
References:	• Meadowbank Complex 2025 Annual Report • Spill reporting summaries • NIRB Project Certificate No. 004, Amendment No. 003: Terms & Conditions 26, 27, and 75
Comment:	The Annual Report documents reportable spill events that occurred during the reporting period and the corrective actions implemented by AEM. Although the reported events do not appear to have resulted in significant adverse environmental effects, review of spill trends can provide useful information regarding recurring operational vulnerabilities and opportunities for preventative action.
Conclusion/Request:	CIRNAC recommends that AEM: a) Identify any recurring spill causes or operational themes that have emerged from recent incident investigations over the last five years; b) Describe measures that are being implemented in 2026 to reduce the likelihood of future spill events and improve environmental protection performance.

Comment Number:	CIRNAC #7
Subject:	Cultural Awareness
References:	• Project Certificate No. 008, Amendment 01, Term and Condition 59 • 2025 Annual Report • 2025 Kivalliq Projects Socio-Economic Monitoring Program Report (Appendix 43)
Comment:	Term and Condition 59 of Project Certificate No. 008 states: “The Proponent is encouraged to work with the Kivalliq Inuit Association to establish cross-cultural training initiatives, which promote respect and consideration for the importance of Inuit Qaujimajatuqangit to the Inuit identity and to make this training available to Project employees and on-site sub-contractors. The Proponent should actively monitor the implementation of these initiatives, including the following items: a) Descriptions of the goals of each program offered; b) Language of instruction;

Comment Number:	CIRNAC #7
Subject:	Cultural Awareness
	c) Schedules and location(s) of when each program was offered; d) Uptake by employees and/or family members where relevant, noting Inuit and non-Inuit participation rates; and e) Completion rates for enrolled participants, noting Inuit and non-Inuit participation rates." Section 11.10.3.2.3.2 of Agnico Eagle's 2025 Annual Report, along with the submitted 2025 Kivalliq Projects Socio-Economic Monitoring Program Report (Appendix 43) outline the Cross-Cultural Training program provided to project employees. The Annual Report states that this training is intended to "reinforce the company's commitment to ensuring that all personnel working on Inuit lands develop a meaningful understanding of Inuit culture, values, and perspectives." The 2025 Kivalliq Projects Socio-Economic Monitoring Program Report further explains that this course is designed for employees from diverse cultural backgrounds to support understanding of cultural differences and improve workplace communication. Agnico Eagle's efforts to deliver cultural awareness training are notable and demonstrate progress toward meeting Term and Condition 59 of its Project Certificate. However, the information presented in the 2025 Annual Report does not fully address all of the required reporting elements. In particular, the report does not specify the language(s) of instruction, nor does it provide disaggregated participation data by Inuit and non-Inuit employees. Additionally, the report does not describe how Agnico Eagle is collaborating with the Kivalliq Inuit Association to establish and maintain the delivery of cultural awareness training.
Conclusion/Request:	CIRNAC recommends that future Annual Report submissions clearly demonstrate how Agnico Eagle is addressing the information requirements outlined in Term and Condition 59 of Project Certificate No. 008, particularly those related to the implementation of its cultural awareness training initiatives. Future submissions should also describe how Agnico Eagle is collaborating with the Kivalliq Inuit Association to support the effective delivery and ongoing success of these training initiatives.

Table A: Previously Identified CIRNAC Closure and Reclamation Comments to be Addressed During Ongoing Closure Planning Processes

CIRNAC Prior Closure and Reclamation Comment #	Topic	CIRNAC's Prior Recommendations	AEM Prior Response/Action	Current Status
Prior 1	Closure Planning	CIRNAC recommends that AEM ensure all previously identified closure questions and concerns, as identified by the Department, are explicitly addressed and documented during the ongoing closure planning process occurring in 2025. For reference, Table A (appended) presents a consolidated list of prior CIRNAC closure-related questions and comments requiring resolution.	Agnico Eagle updated the Closure and Reclamation Plan (CRP) for the Meadowbank Complex and submitted it to CIRNAC and the KivIA in November 2024. This was a proactive approach by Agnico Eagle to initiate dialog with respect to closure for the Meadowbank Complex. This said, there has been active dialogue with CIRNAC and the KivIA since November 2024 on this updated plan. Questions and comments made by CIRNAC and the KivIA on the closure plan are being addressed through this initial review process. Once we have addressed the comments, the updated CRP will be submitted to the NWB for distribution and comment by parties. Agnico Eagle agrees that topics noted in Appendix A are best handled through the detailed review of the updated CRP for the Meadowbank Complex, and not through the annual report review. In addition, the NWB has jurisdiction over waters and waste in Nunavut: this means that it is the regulatory authority in Nunavut with specialized expertise over closure matters, per the Nunavut Waters and Nunavut Surface Rights Tribunal Act. Approval of closure plans is not an environmental assessment matter and is a post project approval matter. The terms and conditions of the Type A Water Licenses do not require submission of closure plans to the NIRB for review. The NWB requires studies and designs to support the closure activities, which are carefully being prepared by Agnico Eagle	Review of AEM's pre-regulatory submission of the Interim Closure and Reclamation Plan (ICRP) has been the subject of extensive dialogue throughout 2025 and into 2026. CIRNAC has been, and continues to be, actively engaged in this review process to address closure-related technical concerns, including those identified during the review of the 2024 Annual Report. Despite these efforts, significant information gaps and technical uncertainties remain with respect to the ICRP. Consequently, many of CIRNAC's previous technical comments regarding the proposed closure approach remain unresolved. Notwithstanding these outstanding issues, CIRNAC notes that the ICRP is currently undergoing formal regulatory review through the Nunavut Water Board. To avoid duplication and potential confusion, CIRNAC recommends that closure-related comments from previous Annual Report reviews be addressed through the ICRP review process rather than as part of the current 2025 Annual Report review. This approach will support a more comprehensive, focused, and transparent technical review of closure-related matters. **CIRNAC Recommendation:** The issue has yet to be resolved. This issue should be addressed through NWB's ongoing ICRP approvals process.

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			to meet the rigorous technical requirements of the NWB.	
Prior 2	Approval of Major Project Changes and Revised Management Plans	CIRNAC recommends that the Nunavut Impact Review Board (NIRB) clarify whether the Annual Report review process is intended to encompass the review of significant project changes.	While the recommendation in this comment is directed to the NIRB, Agnico Eagle respectfully disagrees with CIRNAC's position that a major unauthorized change has not undergone the appropriate reviews; nor has there been "significant project changes". This activity was approved by the NWB (March 25, 2025): • As noted in the NWB letter, on March 21, 2025, NIRB confirmed by email that the proposed activity appears to be within the non-significant amendment: NIRB assessment not required category. • The NWB confirms that the proposed activity is not in conflict with the existing terms and conditions of the Licence. • The NWB looks forward to receiving the updated Water Management Plan as per Part B, Item 16 of the Water Licence 2AM-MEA1530. As part of our submission on February 26, 2025, Agnico Eagle submitted a self-assessment to the NWB related to the activity of the Vault distribution line at Meadowbank. As noted in the submission: • The distribution line is required for operations and closure. • The objective of the distribution line is to transfer contact water from Portage pits to the bottom of Vault Pit within an area of our approved footprint.	CIRNAC is of the view that the proposed changes to the water management approach and TSF closure concepts presented in the revised ICRP constitute significant project modifications by the proponent. CIRNAC also notes that these changes have not yet undergone full regulatory review by the Nunavut Water Board (NWB) and, where applicable, by the Nunavut Impact Review Board (NIRB). With respect to the pumping and deposition of reclaim water from the Goose and Portage Pits to the Vault Pit, CIRNAC understands that NWB approval pertains to the operations phase of the project only. Specifically, this approval is not considered to extend to the closure phase, and any authorization for closure-related use of the Vault Pit would be evaluated through a Final Closure and Reclamation Plan (FCRP). While the NWB has approved the transfer and temporary storage of contaminated water in the Vault Pit, this should not be interpreted as approval for permanent retention of water in the pit as a closure strategy. Until a revised closure approach is formally approved through an FCRP, the closure strategies outlined in the original CRP are considered to represent the approved and applicable closure concepts for the site. Regarding the TSF cover, CIRNAC continues to review the revised closure concepts submitted by the proponent. Additional information is required to

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			• An update to the Water Management Plan would be submitted to NWB (as per Part B, Item 16 of the Water Licence) within 60 days of approval of this notice. • The updated WMP was included with the 2024 annual report. In addition, when the Vault distribution line was discussed in May at the latest CRP working session with CIRNAC and the KivIA, CIRNAC representative (Andrew Keim) indicated there was no need to discuss further. As ultimately, by reviewing the information provided from CIRNAC and Agnico Eagle, as well as soliciting the NIRB's opinion, the NWB made a decision on the activity. Regarding the TSF cover. Agnico Eagle has advanced the closure cover for the TSF. This is one of the items currently in review with KivIA and CIRNAC. CIRNAC has attended all of those meetings. Updated information on the TSF cover will be provided once the review process with CIRNAC and KivIA is complete.	demonstrate that the proposed revisions will achieve outcomes comparable to those associated with the previously approved design. **CIRNAC Recommendation:** CIRNAC is of the view that this matter should be addressed through the NWB's ongoing ICRP review and approval process.
Prior 3	Water Quality Predictions of Unapproved Activities	CIRNAC recommends that AEM resubmit Appendix 13 and 14 of the 2024 Annual Report with predictions that are relevant to project components that have been approved under the relevant Project Certificates and Water Licences. Predictions associated with proposed but unapproved project activities should not be included in the updates. The revised Appendices should be submitted no later than October 1st, 2025.	Agnico Eagle respectfully disagrees with CIRNAC's position that a major unauthorized change has not undergone the appropriate reviews. As noted above, the Vault distribution line has been approved, and the updated TSF cover design is currently in review with CIRNAC and the KivIA. As part of the TSF cover design, it is necessary to carry forward models that incorporate the proposed design features. It is not reasonable to present multiple models as this will create	Contrary to AEM's assertion, given that a Final Closure and Reclamation Plan (FCRP) has not yet been developed or approved, it is CIRNAC's understanding that the revised closure strategies presented in the ICRP have not received regulatory approval. With respect to AEM's position that active management plans and modelling predictions should incorporate closure activities that have yet to be approved, CIRNAC does not agree. Management

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			confusion. In addition, the annual report should focus on monitoring and predictions for operations, and leave predictions for closure for the active dialogue on the updated CRP.	plans and associated modelling should reflect only those activities that have received approval. While proposed revisions may be appropriately considered in the context of an application for approval, it is not appropriate for the Proponent to include unapproved closure activities within the scope of the Annual Report review process. Unresolved: CIRNAC will consider whether to pursue this matter further with NIRB and/or the NWB. Should CIRNAC determine that further engagement is warranted, the previous TRC comment may be reiterated. **CIRNAC Recommendation:** The issue has yet to be resolved.
Prior 4	Model Prediction Accuracy and Decision Making	CIRNAC recommends that AEM perform quantitative sensitivity analyses of their water quality predictions. The analyses should quantify potential variability in all major source terms and associated pathways (e.g., elevated arsenic seepage from pit walls, waste rock storage facilities (WRSFs) and mine areas). CIRNAC acknowledges that some sensitivity analyses have already been performed in prior predictions, but a more comprehensive analysis of all variables is justified.	Agnico Eagle disagrees to the degree of uncertainty in the model. The differences between model outputs are not because of uncertainty, rather they are because of changes in water management strategy and movement of water, in particular, for Goose Pit and IVR Pit. For example, Figure 6-2 shows monitoring data compared with the 2023 and 2024 models. Generally, both water quantity (water levels) and water quality (concentration) are in agreement with monitoring results, and there is a high degree of certainty in model predictions. Differences between model iterations are also explained by source term updates through laboratory testing and model calibration to site monitoring data. Agnico Eagle progressively investigates opportunities for model improvements via model verification and calibration exercises	AEM indicates that differences between model outputs are attributable to changes in the water management strategy rather than modelling uncertainty. On this basis, AEM concludes that sensitivity analyses are not warranted. CIRNAC does not agree. Substantive deviations between predicted and measured parameter concentrations indicate that there is inherent uncertainty in the modelling. As noted in CIRNAC's original comment: *"CIRNAC notes that such variances are common with predictions of complex environmental systems that can be challenging to model. In this regard, CIRNAC is not criticizing AEM's predictions; to the contrary, competent professionals perform AEM's predictions, using a large inventory of monitoring data and industry best practices. CIRNAC is, however,*

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			each year. These exercises provide an opportunity to verify model results with monitoring data and calibrate model components where necessary. It is Agnico Eagle's opinion that there is greater benefit to taking this approach, whereby the model is iteratively validated and updated based on real world data, than by running a broad range of "what if" sensitivity analyses. Regarding Figure 6-4, the ICRP states that active closure period is defined by the period until which water quality in Whale Tail North Basin meet CCME or SSWQO guidelines. In this case, the parameter of concern is arsenic, and the guideline is a SSWQO of 0.025 mg/L for total arsenic. This is the criteria for defining when post-closure period begins. Post-closure period cannot begin unless all parameters meet CCME or SSWQO guidelines, including arsenic. As noted above, Agnico Eagle disagrees with the conclusion of the degree of uncertainty in model predictions. Regardless, if SSWQO for arsenic are not met, Agnico Eagle will continue with active closure water management practices. In addition, monitoring is ongoing during operations, as well as the 17-year active and passive closure life cycle. Throughout this time period, the water balance and water quality model will be compared to monitoring data and calibrated on an annual basis as per Water Licence conditions. There will be sufficient time to recognize changes from the predicted	*concerned that the uncertainty associated with the predictions has been overlooked when making some project decisions"* CIRNAC maintains that the Proponent should undertake quantitative sensitivity analyses to better characterize uncertainty in water quality predictions. CIRNAC also notes that this matter is currently being addressed through CIRNAC's participation in the ongoing NWB review of the Proponent's revised ICRP. **CIRNAC Recommendation:** The issue has yet to be resolved. CIRNAC recommends that this issue be addressed through NWB's ongoing ICRP approvals process.

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			water quality and take corrective action in the form of adaptive management.	
Prior 5	Duration of Modelling Predictions	CIRNAC recommends that AEM extend the duration of all future water quality modelling predictions to 100 years post-closure. Shorter durations should only be considered if AEM can demonstrate that site factors (e.g., WRSF hydraulic field capacities) or climate change are not relevant to the system being modelled.	Agnico Eagle can only provide model results (for future iterations) out to 2100. This is because IPCC projections do not extend further than this and is an industry standard to cut off model predictions at 2100.	AEM is correct that modelling to assess the impacts of climate change is often limited to the year 2100 due to constraints associated with IPCC projections. However, despite this limitation, it is common practice to extend modelling beyond this period using fixed climate inputs to evaluate long-term water quality outcomes. This approach supports closure decision-making by ensuring that predictions reflect fully developed geochemical source terms, including both the magnitude and quality of future loadings. CIRNAC maintains that AEM should extend the duration of future water quality modelling predictions to at least 100 years post-closure to better inform long-term closure performance. CIRNAC also notes that this matter is currently being addressed through its participation in the ongoing NWB review of the AEM's revised ICRP. **CIRNAC Recommendation:** The issue has yet to be resolved. CIRNAC recommends that this issue is appropriately addressed through the NWB's ongoing ICRP review and approvals process.

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Prior 6	Waterline to Vault	CIRNAC recommends that: a) AEM defer from implementing any newly proposed closure related activities until the full CRP has been finalized, assessed and approved. b) b) Within the limits of applicable legislation, NIRB reconsider whether the construction and/or operation of the new pipeline to the Vault Pit requires an Environmental Assessment.	As noted in responses above, and as referenced in letters from the NIRB and the NWB, the activity of moving water between exhausted pits has been approved and is within the conditions of the licence. NIRB has already provided an opinion that the Vault distribution line is within the thresholds of a non-significant amendment; therefore, a NIRB assessment was not required. When the Vault distribution line was discussed in May at the latest CRP working session with CIRNAC and the KivIA, CIRNAC representative (Andrew Keim) indicated there was no need to discuss further. As ultimately, by reviewing the information provided from CIRNAC and Agnico Eagle, as well as soliciting the NIRB's opinion, the NWB made a decision on the activity. Agnico Eagle will not be deferring the Vault distribution line as it is a form of operational management of moving water around site. In addition, an assessment through the NIRB is not required, as the overarching water management strategy has not changed from what was previously proposed: • The key component of the strategy remains the same: flooding the open pit mines at closure. • Water is being treated, whether via active treatment, in-situ/aeration method, or some combination.	As noted in the assessment of CIRNAC-02 (see above), CIRNAC understands that the NWB's approval of pumping and storage of reclaim water from the Goose and Portage Pits to the Vault Pit applies to the operations phase of the Project only. Specifically, CIRNAC understands that this approval does not extend to the closure phase, and that any such authorization would be considered in the context of a Final Closure and Reclamation Plan (FCRP). In summary, while the NWB has approved the transfer and temporary storage of impacted water in the Vault Pit, this should not be interpreted as approval for the AEM to retain water in the base of the pit as a permanent closure strategy. Until a revised closure approach is formally approved through an FCRP, the approved closure water management strategy remains the treatment and discharge of Goose and Portage reclaim water to the receiving environment. **CIRNAC Recommendation:** CIRNAC recommends that this issue should be addressed through the NWB's ongoing ICRP review and approvals process.

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			• Treated water would be discharged to the environment, albeit much lower volumes and loadings. Finally, Agnico Eagle would like to address some comments raised by CIRNAC in their background/rationale preamble: 1) The Vault distribution line is not just for closure. As per communication sent to the NWB on March 5, 2025 from Agnico Eagle "Agnico Eagle confirms this line is needed for and will be used in Operations and into Closure." This was also discussed with CIRNAC, KivIA, and the NWB at a meeting in Toronto on March 4, 2024. It is inappropriate to make a comparison to the Meliadine Waterline file and associated NIRB process. While the objectives are the same, to move water, the undertakings and technical details are not. The Meliadine waterline application was to convey treated saline effluent for discharge directly to the marine environment. The Vault distribution line is moving water around site between exhausted pits.	
Prior 7	Meromixis Stability in Vault Pit	CIRNAC recommends that AEM clarify whether it will pump reclaim water from the Portage and Goose Pits to the Vault Pit beginning in 2026 if the revised water management approach has not been approved through the approval of a final CRP for the project.	As noted in responses above, Agnico Eagle reiterates the activity of moving water between exhausted pits has been approved by the NWB and is within the conditions of the licence. At this time, it is predicted that water will be moved between the pits in 2026.	AEM's response indicates that the movement of water between exhausted pits has been approved by the NWB. While this statement is accurate, it does not address the substance of CIRNAC's request. Specifically, AEM has not clarified whether it intends to pump reclaim water from the Portage and Goose Pits to the Vault Pit beginning in 2026 in the event that the revised water management approach has not yet been approved through a final Closure and Reclamation Plan (CRP).

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				CIRNAC Recommendation: The issue has yet to be resolved. CIRNAC recommends that this issue be addressed through NWB's ongoing ICRP approvals process.
Prior 8	Water Treatment of Reclaim Water	CIRNAC recommends that AEM: a) Clarify why the approved strategy of treating and discharging reclaim water to the surface water environment is no longer a viable closure approach; and b) Indicate what additional parameters would need to be removed from the reclaim water after pre-treatment for arsenic and copper, followed by in-situ treatment for nitrogen species before discharging the reclaim water to the environment (i.e., instead of storing the water in the Vault Pit). c) Provide a list of public discussions, technical and general community input, on the proposed new use of the Vault Pit.	The CRP (ICRP) will be circulated through the NWB in the coming months whereby Agnico Eagle suggests comments are handled through the detailed review of the updated CRP for the Meadowbank Complex, and not through the annual report review. As per responses to other comments, Agnico Eagle has the approval of moving water between exhausted pits and has been approved by the NWB and is within the conditions of the licence. Managing and treating water is part of standard operational practices. Agnico Eagle has approved water management systems in place on-site to move and treat water to meet water quality objectives; therefore, water quality is protective of the receiving environment.	Consistent with CIRNAC's conclusions regarding other comments on the 2024 Annual Report submitted to NIRB, CIRNAC agrees with AEM's position that this and other closure-related matters are more appropriately addressed within the context of the ongoing NWB review of the revised ICRP. **CIRNAC Recommendation:** The issue has yet to be resolved. CIRNAC recommends that this issue should be addressed through the NWB's ongoing ICRP review and approvals process.
Prior 9	Recontamination of Goose and Portage Pit Lakes	CIRNAC recommends that AEM: a) Perform detailed long-term modelling of water and sediment quality in the Portage and Goose Pit Lakes, taking into consideration all potential source terms; and b) b) Commit to delaying reconnecting the flooded pit lakes to the surface water environment until there is a minimum of 5 years of monitoring data proving that water and sediment concentrations are stable and safe for	A Human Health and Ecological Risk Assessment (HHERA) was prepared to support the CRP. The objective of the HHERA was to evaluate the potential risks to human health and the environment from the historical operation and remediation of the Site. The HHERA included evaluation of ecological risks (including aquatic life) to future water quality in the pits. There were no parameters of potential concern (POPCs) identified in Vault Pit. Thus a 15 m depth of freshwater is sufficient to protect aquatic life.	AEM's responses do not address CIRNAC's recommendations. AEM has not provided documentation demonstrating that water quality in the reflooded pits will remain stable over time or that re-contamination will not occur as a result of ongoing loadings from submerged tailings. With respect to the proposed 15 m "clean water" cover, AEM has only assessed the presence of parameters of potential concern (POPCs) in the upper layer. No information has been provided to demonstrate that this thickness is sufficient to prevent exposure of

Table A: Previously Identified CIRNAC Closure and Reclamation Comments to be Addressed During Ongoing Closure Planning Processes

CIRNAC Prior Closure and Reclamation Comment #	Topic	CIRNAC's Prior Recommendations	AEM Prior Response/Action	Current Status
		use by fish and other aquatic receptors.	DFO has previously informed Agnico Eagle that they do not have confidence in flooded pits as a fish and fish habitat offsetting measure, as described in a letter from 2015 (DFO, November 27 2015, Offsetting Proposals). The flooded Vault Pit will not become aquatic habitat, and there were no parameters of potential concern (POPCs) identified in Vault Pit.	aquatic biota to underlying contaminated water. Regarding Fisheries and Oceans Canada (DFO)'s statements, the department has indicated only that flooded pit lakes would not qualify as offsetting habitat. This does not preclude colonization by aquatic biota, nor does it address the potential for exposure to elevated concentrations of POPCs. AEM has not provided sufficient evidence to demonstrate that water and sediment quality within the reflooded pits will be protective of aquatic life. **CIRNAC Recommendation:** The issue has yet to be resolved. CIRNAC recommends that this issue should be addressed through the NWB's ongoing ICRP review and approvals process.
Prior 10	Meadowbank TSF Cover Design	CIRNAC recommends that AEM: a) Indicate whether the updated WQLBM presented in the 2024 Annual Report was based on the approved 2 m thick thermal cover or the unapproved 1 m thick intrusion barrier; and b) b) Indicate whether the progressive reclamation performed on the Meadowbank TSF has been in accordance with the approved 2 m thick thermal cover or the unapproved 1 m thick intrusion barrier.	The WBWQM is not based on the 2-meter thick cover but instead based on the hybrid isolation/thermal cover design (TSF cover) from Okane. Okane developed a contaminant transport model for the cover, which was incorporated into the WBWQM. This cover consists of varying cover thicknesses, from a minimum 1 meter to a maximum of 6 metres, which has been presented to CIRNAC in Ottawa on May 8-9, 2025. Progressive reclamation of the TSF is in progress as NPAG material becomes available. At this stage, progressive reclamation is indistinguishable whether the final design is a 2-meter cover or the hybrid isolation/thermal cover.	Subsequent to AEM's response, AEM has committed to constructing the TSF cover to a minimum thickness of 2 m. On this basis, CIRNAC's understanding is that AEM's current TSF cover strategy is aligned with prior expectations. Accordingly, CIRNAC's previous recommendations and AEM's responses on this matter are no longer considered applicable. Notwithstanding the above, CIRNAC considers that this matter warrants further evaluation in the context of the ongoing ICRP review process being conducted by the NWB. **CIRNAC Recommendation:** The issue has yet to be resolved. CIRNAC recommends

Table A: Previously Identified CIRNAC Closure and Reclamation Comments to be Addressed During Ongoing Closure Planning Processes

CIRNAC Prior Closure and Reclamation Comment #	Topic	CIRNAC's Prior Recommendations	AEM Prior Response/Action	Current Status
				that this issue should be addressed through the NWB's ongoing ICRP review and approvals process.
Prior 11	Groundwater Migration of TSF Reclaim Water	CIRNAC recommends that AEM: a) Confirm that the updated WQLBM predictions presented in Appendix 13 have included potential loadings of TSF reclaim water migrating via the groundwater pathway; b) Describe the migration pathway of reclaim water from the TSF into the groundwater system; and c) c) Describe approaches/options that could be used to mitigate TSF reclaim water and/or seepage from entering the groundwater system if flows are deemed to be unacceptable.	Agnico Eagle's responses to CIRNAC's recommendations are below: TSF seepage is currently represented in the WBWQM by the Central Dike flows that move eastwards towards Pit A and Pit E. These flows are driven by the hydraulic gradient that currently exists between these pits and the TSF, and the model assumes that once the pits have been flooded, this gradient is null, and the TSF seepage does not report to Pit A and Pit E. The TSF is constructed within the northern arm of the Second Portage Lake (SPL) within an open talik that extends down to the deep groundwater flow regime. Reclaim water enters into the deep groundwater system by infiltrating downward through the TSF, till, weathered bedrock and into the bedrock. Regional groundwater is interpreted to flow east towards the SPL and Third Portage Lake (TPL). Available thermal monitoring and modeling results (SNCL 2018) indicate that a permafrost bulb exists between the West Road and TPL which extends greater than an elevation of 200 m (300 m depth). As a result, the migration pathway of reclaim water from the center of the TSF into the groundwater system to the SPL is at least 1,500 m. The closure plan includes the capping of the TSF to reduce infiltration and direct it to TPL and flooding of the Central Dike Pond and Portage Pits. This will result in lowering	Unlike CIRNAC's other comments, AEM provided a substantive technical response to CIRNAC-11. In general, the response presents information indicating that contaminant loads via the groundwater pathway are unlikely to result in significant adverse effects. Notwithstanding this, CIRNAC considers that this topic warrants further evaluation within the context of the ongoing ICRP review process being conducted by the NWB. **CIRNAC Recommendation:** The issue has yet to be resolved. CIRNAC recommends that this issue should be addressed through the NWB's ongoing ICRP review and approvals process.

Table A: Previously Identified CIRNAC Closure and Reclamation Comments to be Addressed During Ongoing Closure Planning Processes

CIRNAC Prior Closure and Reclamation Comment #	Topic	CIRNAC's Prior Recommendations	AEM Prior Response/Action	Current Status
			the water level in the TSF and over time it will be similar to the water level in the pit lake. In addition, thermal modelling results indicate that the TSF will gradually freeze over time and a talik zone will develop between the pit lake and the SPL and eventually at the reconnected TPL (SNCL 2018). As a result, the hydraulic gradient between the TSF and the Portage pit areas will be greatly reduced to near zero, and the flux from the tailings area into the lake will be negligible. At closure thermal modelling undertaken by SNC indicates that the groundwater pathway from the TSF through the overburden is frozen and the groundwater pathway needs to flow down and beneath a 300 m deep permafrost bulb to TPL. Darcy's Law was used to estimate the potential inflow of reclaim water into the groundwater system. The hydraulic conductivity of the bedrock was conservatively estimated to range between 1.8 x 10-8 m/s and 2.7 x 10-8 m/s. The estimated groundwater flux from the approximate 1,000 m by 900 m area of the TSF along an approximately 1,500 m flow path ranges between 1,500 to 2,250 m3/year. Thermal modelling predicts that after closure the overburden between the TSF and the pit lake will become unfrozen, resulting in a shorter groundwater flow path for the reclaim water. At the Central Dike (CD) a liner is tied into the grout curtain through the weathered bedrock. This results in the groundwater flowing beneath the liner and	

Table A: Previously Identified CIRNAC Closure and Reclamation Comments to be Addressed During Ongoing Closure Planning Processes

CIRNAC Prior Closure and Reclamation Comment #	Topic	CIRNAC's Prior Recommendations	AEM Prior Response/Action	Current Status
			grout curtain to discharge though the pit lake. In addition, as discussed above, the water level in the TSF and the gradual freezing of the TSF will reduce the water level difference between the TSF and the pit lake. The area of groundwater flow through the overburden is smaller than these area of flow at closure (i.e., approximate thickness of the overburden 30 m by 900 m width of the tailings). The combination of these factors (even if the water level in the TSF is assumed to remain the same) is predicted to result in a discharge of reclaimed water to less than predicted at closure (ranging from about 350 m3/year to 500 m3/year). It is noted the available groundwater quality at CD monitoring well MW-16-01, located west and downgradient of the TSF currently meets the Third Portage Effluent Discharge Limits of the Meadowbank Water Licence No. 2AM-MEA1530. Hydrogeologic model results (SNCL 2018) indicate the freshwater runoff input to Pit A is 900,000 m3/year. The amount of TSF reclaim water input to the groundwater system that will eventually be discharged to SPL is estimated to be small (less than 0.25% contribution right after closure and 0.06% contribution once the overburden becomes thawed between the CD and the pit lake, which is equivalent to a dilution factor of 400 to 1,800, respectively) compared to surface water runoff and are deemed acceptable; therefore, TSF mitigation is not considered required.	

Table A: Previously Identified CIRNAC Closure and Reclamation Comments to be Addressed During Ongoing Closure Planning Processes

CIRNAC Prior Closure and Reclamation Comment #	Topic	CIRNAC's Prior Recommendations	AEM Prior Response/Action	Current Status
			In addition, hydrogeologic model results (SNLC 2018) indicate groundwater seepage volume to Pit A is 43 m3/year, while the freshwater runoff input to the lake 900,000 m3/year. The estimated TSF reclaim water input to the groundwater system that will eventually be discharged to SPL is negligible (0.05% contribution or a dilution factor of 21,000) compared to surface water runoff and are deemed acceptable; therefore, TSF mitigation is not considered required.	
Prior 1 to 10	Closure and Reclamation	In addition to the eleven comments described above, CIRNAC's review of the 2024 Annual Report included Table A which summarized an additional set of ten "Prior" comments that had been included in CIRNAC's previous Annual Report reviews. The ten prior comments remained unresolved due to insufficient AEM responses. Given the lack of progress that had been made on addressing these comments through the Annual Report review process, CIRNAC issued the following recommendation for all ten of the prior comments: *CIRNAC Recommendation: The issue has yet to be resolved. CIRNAC recommends that AEM explicitly address and document the issue through the closure and reclamation planning process.*	Agnico Eagle agrees that topics noted in (Table) A are best handled through the detailed review of the updated CRP for the Meadowbank Complex, and not through the annual report review.	The updated ICRP reviewed during the pre-regulatory submission process does not address the previously identified comments (Prior Comments 1–10). **CIRNAC Recommendation:** CIRNAC recommends that this issue should be addressed through the NWB's ongoing ICRP review and approvals process.

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, licenses or other approvals issued for the Project, where applicable, and report annually to the NIRB on the status of those incorporated terms and conditions.

CIRNAC has a broad mandate for the co-management of water resources and the management of Crown land in Nunavut under the following applicable acts and regulations:

- The *Department of Crown-Indigenous Relations and Northern Affairs Act;*
- The *Nunavut Land Claims Agreement Act* and the Nunavut Agreement*;*
- The *Arctic Waters Pollution Prevention Act* and *Regulations;*
- The *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and *Regulations;* and
- The *Territorial Lands Act* and *Regulations.*

CIRNAC's monitoring responsibilities are fulfilled by reviewing and providing expert advice and comments to the NIRB and the Nunavut Water Board (NWB) on Annual Reports and conducting site inspections. CIRNAC Inspectors conduct site inspections to ensure project activities are compliant with terms and conditions in any water licence(s), land use authorization(s), such as land use permits and leases, and the Project Certificate. Inspectors prepare site inspection reports with observations and recommendations, and they have the authority to issue and enforce directions with a timeline for implementing corrective measures.

CIRNAC issued the following Crown Land Leases for AEM's Meadowbank Gold Mine and Whale Tail Pit projects, respectively:

- 66A/8-71-3 (AWAR) and 66A/8-72-6 (AWAR Quarries); and
- 66H/8-02-1 (Whale Tail Haul Road) and 66H/8-01-4 (Whale Tail Haul Road Quarries).

CIRNAC has reviewed the Type A Water Licences associated with the Meadowbank Gold Mine and Whale Tail Pit Projects with respect to Project Certificate No. 004 (Amendment No. 003) and Project Certificate No. 008 (Amendment No. 001) and has included concordance tables (Appendix A and Appendix B) that outline how Project Certificates Terms & Conditions have been incorporated in the Water Licences and Crown Land Leases.

ii. A summary of any inspections conducted during the 2025 reporting period, and the results of these inspections;

In 2025, the project's activities and monitoring were conducted under the following NWB Water Licences:

- Type A Water Licence 2AM-MEA1530 (Meadowbank Gold Mine Project); and
- Type A Water Licence 2AM-WTP1830 (Whale Tail Pit Project).

CIRNAC's Water Resource Officer conducted two inspections during the 2025 reporting period. A summary of the inspection reports is presented below for NIRB's consideration, and a detailed summary can be accessed using the hyperlinks above.

Inspection 1	Licence No. 2AM-MEA1530
Area(s)	Meadowbank site
Inspection Dates	June 13 and 14, 2025
Observations	The inspection focused on freshet-related compliance under Water Licence 2AM-MEA1530. At the time of inspection, water use at the ST-1 Third Portage Lake water barge was 241,334 m^3. The Inspector observed that the Mill Seep was actively flowing and being captured by installed recovery structures, although capture rates were inconsistent. Reported recovery volumes prior to inspection were 161 m^3 on June 12, 152 m^3 on June 13, and 0 m^3 on June 14, with a total 2025 recovery to date of 9,567 m^3. Site representatives advised that CN-WAD was not detected in the recovered water, indicating that the source was likely not mill-related infrastructure. The leachate pad had been temporarily sealed, with further sealing planned for summer 2025. The Inspector noted that Goose Pit was under closure trial conditions and had an aerator placed on the lake during winter. Pit E had no activity at the time of inspection, while Pit A had active tailings deposition. Vault Pit was identified as potentially being re-dewatered for possible use as a reclaim water pond during closure. Several site features were inspected and found to be unremarkable, including the East Dyke Seep / ST-8 area, Wally Lake Dyke, ST-16, ST-5, ST-31, ST-30, China Sump, West Diversion Ditch, and Saddle Dams 1 through 4. The Inspector found the NP-1 and NP-2 culverts beneath the haul road to be unsatisfactory. The report notes that additional damage from pre-freshet snow clearing had caused the installed culverts to unravel below the road base, and AEM indicated that a plan would be provided to the Inspector. The Inspector also observed that Quarry 23 / Final Polishing Pond infrastructure had been designed to collect tailings runoff through closure, with future use as a polishing pond once capping is complete. At the Baker Lake Marshalling Facility, diversion works appeared to be functioning as intended, and the Inspector considered the prior concern regarding Total Suspended Solids exceedances to be closed. No instances of non-compliance were identified during the inspection.
Result	No non-compliance was recorded; however, the Inspector required the Licensee to provide the committed plan for repair/replacement of the NP-1 / NP-2 culverts by July 18, 2025.

Inspection 2	Licence No. 2AM-WTP1830
Area(s)	Whale Tail site
Inspection Date	June 13, 2025
Observations	The inspection focused on freshet-related water management under Water Licence 2AM-WTP1830. At the time of inspection, water use at the Nemo

Inspection 2	Licence No. 2AM-WTP1830
	Lake intake (ST-WT-5) was reported as 33,428 m^3. Discharge from the IVR Attenuation Pond to Whale Tale Lake at ST-WT-24 was ongoing at a rate of 750 m^3/hour. The Inspector noted: • IVR Attenuation Pond held approximately 124,000 m^3 and was actively discharging. • Several inspected sumps and water management structures were unremarkable, including Groundwater Service Pond 1, ST-WT-34, ST-WT-35, ST-WT-36, ST-WT-37, A47 sump, ST-WT-33, ST-WT-32, ST-WT-31, ST-WT-30, WRSF Dyke, ST-WT-3, and ST-WT-13. • Melting permafrost at the A47 sump was undercutting the banks; however, this was not considered a concern because the sump was being managed as contact water. • IVR Pit was in winter maintenance and storing some water, while Whale Tale Pit remained in operation. • Several monitoring station signs were damaged or missing due to snow clearing, and replacements were underway. No instances of non-compliance were noted during the inspection.
Result	No non-compliance was recorded and no actions were required following the inspection.

iii. A summary of AEM's compliance status with regard to authorizations that have been issued for the project.

No non-compliances related to Water Licence conditions and the *Nunavut Waters and Nunavut Surface Rights Tribunal Act S.C 2002, c. 10* were noted during 2025 inspections.

CIRNAC will continue to work with Agnico Eagle to ensure continued compliance with all water licence requirements associated with this project.

Appendix A. Meadowbank Gold Mine Project Certificate Terms and Conditions (T&C) incorporated into any permits, certificates, licenses or other approvals issued for the Project[1]

T&C#	NIRB Project Certificate No. 004	Implemented in Licences or Permits
5	Cumberland shall meet with respective licensing authorities prior to the commencement of construction to discuss the posting of adequate performance bonding. Licensing authorities are encouraged to take every measure to require that sufficient security is posted before construction begins. This bonding should not duplicate other amounts of security required (e.g., the NWB).	All of Part C of NWB Water Licence (2AM-MEA1530). Parts 16-19 of Lease No. 66A/8-71-3 (covers the sections of the all-weather access road) located on Crown land). Part 34-37 of Lease No. 66A/8- 72-6 (covers the quarries located on Crown land).
9	Cumberland shall provide detailed plans for water treatment for the tailings (reclaim pond) discharge, and on a contingency basis for the attenuation pond discharge(s) and for the pits, including estimates of treatment efficiency for each parameter of concern and the description of pH adjustments in the water license application to the NWB.	Part B, Item 13 of NWB Water Licence (2AM-MEA1530).
13	Cumberland shall not permit the water discharged into Wally Lake and Third Portage Lake to exceed receiving environment discharge criteria established by the NWB or as otherwise required by law.	Partially, the portion referring to criteria established by the NWB is found in Part F, Items 3 and 4 within the NWB Water Licence (2AM-MEA1530).
14	Cumberland shall not remove dewatering dikes until the quality of water contained within them is of sufficient quality to meet receiving environment discharge criteria established by the NWB or as otherwise required by law.	Part E, Item 7 of NWB Water Licence (2AM-MEA1530).
15	Cumberland shall within two (2) years of commencing operations re-evaluate the characterization of mine waste materials, including the Vault area, for acid generating potential, metal leaching and non-metal constituents to confirm FEIS predictions, and re-evaluate rock disposal practices by conducting systematic sampling of the waste rock and tailings in order to incorporate preventive and control measures into the Waste Management Plan to enhance tailing management during operations and closure. The results of the re-evaluations shall be provided to the NWB and NIRB's Monitoring Officer.	Part B, Item 13 of NWB Water Licence (2AM-MEA1530).
18	Cumberland shall commit to a pro-active tailings management strategy through active monitoring, inspection, and mitigation. The tailings management strategy will include the review and evaluation of any future changes to the rate of global warming, compliance with regulatory changes, and the ongoing review and evaluation of relevant technology developments, and will respond to studies conducted during the mine operation.	Part B, Item 13 of NWB Water Licence (2AM-MEA1530).
19	Cumberland shall provide for a minimum of two (2) metres cover of tailings at closure, and shall install thermistor cables, temperature loggers, and core sampling technology as required to monitor tailing freeze-back efficiency. Cumberland shall report to NIRB's Monitoring Officer for the annual reporting of freeze-back effectiveness.	Schedule B, Item 18 and Part B, Item 13 of NWB Water Licence (2AM-MEA1530).

[1] The following Meadowbank Gold Mine Project Certificate No. 004 (Amendment No. 003) T&Cs continue to apply also to the Whale Tail Pit Project: 9, 13, 14, 18, 19, 23, 25-27, 35, and 79.

T&C#	NIRB Project Certificate No. 004	Implemented in Licences or Permits
20	Prior to construction, Cumberland shall identify mitigation measures that can be taken if groundwater monitoring around the tailings facility demonstrates that contamination from tailings has occurred through the fault. Upon drawdown of the North arm of Second Portage Lake, Cumberland shall conduct further tests to assess the permeability of any faults and provide the results to regulators. If doubt remains Cumberland shall seal the fault and conduct further permeability testing and monitoring.	Part B, Item 13 of NWB Water Licence (2AM-MEA1530).
22	Prior to the commencement of the Project, Cumberland shall fund and install an onsite lab that has the capability to monitor parameters at a type and at a frequency acceptable to the NWB and EC at all site discharge points. The results of these analyses, as well as any other water quality monitoring required by regulatory authorities shall be used in the submission of a receiving water assimilative capacity water quality assessment study of concern to regulators. The lab shall be certified for environmental water quality analysis purposes with standards to include the calibration of water quality monitoring instruments. Cumberland shall file proof of application to become accredited upon the request of the NWB.	Partially, Part I, Items 16, 17, 18, 19 and 20 of NWB Water Licence (2AM-MEA1530) relate to this condition, but not to the installation of an onsite lab prior to construction.
23	For the purposes of monitoring quality assurance and quality control ("QA/QC"), Cumberland shall ensure that water quality monitoring performed at locations within receiving waters that allow for an assimilative capacity assessment of concern to regulators, be carried out by an independent contractor and submitted to an independent accredited lab for analysis, on a type and frequency basis as determined by the NWB. Results of analysis shall be provided to the NWB and NIRB's Monitoring Officer.	Part I, Item 16 of NWB Water Licence (2AM-MEA1530).
24	Cumberland shall identify an area and design for a landfill for disposal of operational and closure non-salvageable materials, including a list of any non-salvageable materials, and a procedural manual for preparation of location and placements of these materials, and incorporate the design into the final Waste Management Plan as instructed by the NWB.	Part B, Item 13 of NWB Water Licence (2AM- MEA1530).
25	Cumberland shall manage and control waste in a manner that reduces or eliminates the attraction to carnivores and/or raptors. Cumberland shall employ legal deterrents to carnivores and/or raptors at all landfill and waste storage areas. The deterrents are to be developed taking into consideration Traditional Knowledge and in consultation with the HTO, EC and CIRNAC and incorporated into the final Waste Management Plan prior to filing the Plan with the NWB.	Partially, this was not captured within the NWB Water Licence as it was already completed prior to licence approval. AEM's NWB Water Licence (2AM-MEA1530) does however require adherence to the Waste Management Plan under Part B, Item 13.
26	Cumberland shall ensure that spills, if any, are cleaned up immediately and that the site is kept clean of debris, including wind-blown debris.	Part H, Items 1 and 2 of NWB Water Licence (2AM- MEA1530). Partially, Conditions 45-47 of Lease No. 66A/8-71-3 (covers the sections of the AWAR located on Crown land). Partially, Conditions 47, 52-56 and 55 of Lease No. 66A/8-72-6 (covers the quarries located on Crown land).

T&C#	NIRB Project Certificate No. 004	Implemented in Licences or Permits
27	Cumberland shall ensure that the areas used to store fuel or hazardous materials are contained using safe, environmentally protective methods based on practical, best engineering practices.	Part H, Item 3 of NWB Water Licence (2AM-MEA1530). Partially, Conditions 45-47 of Lease No. 66A/8-71-3 (covers the sections of the AWAR located on Crown land). Partially, Conditions 52-56 of Lease No. 66A/8-72-6 (covers the quarries located on Crown land).
33	Cumberland shall update the Access and Air Traffic Management Plan to: 1. Include an All-weather Private Access Road Management Plan, including a right-of-way policy developed in consultation with the KivIA, GN, CIRNAC and the Hamlet of Baker Lake, for the safe operation of the all-weather private access road; and 2. To facilitate monitoring of the environmental and socio-economic impacts of the private road and undertake adaptive management practices as required, including responding to any concerns regarding the locked gates.	Partially, item 1 is addressed under Condition 54 of Lease No. 66A/8-71-3 (covers the sections of the AWAR located on Crown land).
35	Cumberland shall reclaim the all-weather private access road at the end of the mine life to prevent any future use of the road, including scarification of the road and restoration of the natural hydrology, topography, and vegetation, subject only to Cumberland and/or its successor seeking NIRB Article 12 approval for the road to be maintained and operated beyond the life of the mine.	Partially, Conditions 12 and 15 of Lease No. 66A/8-71-3 (covers the sections of the AWAR located on Crown land).
78	Cumberland shall file a complete Closure and Reclamation Plan developed to comply with CIRNAC's policy of full cost of restoration and any related NWB requirements such that the Inuit and taxpayers are not liable for any cost associated with the cleanup, modification, decommission, or abandonment.	Partially, Part B, Item 13 of NWB Water Licence (2AM- MEA1530). Partially, Conditions 12, 15, 16-19, 26 of Lease No. 66A/8-71-3 (covers the sections of the AWAR located on Crown land). Partially, Conditions 14, 17, 26, 34-38 of Lease No. 66A/8-72-6 (covers the quarries located on Crown land).
79	In addition to the NWB's requirements, the final Closure and Reclamation Plan shall require Cumberland to: a. Ensure that mine facilities and infrastructure are abandoned in such a manner that: • The Project site is physically stable and any requirements for long term maintenance and monitoring are minimized; • Threats to public safety and wildlife are eliminated; and • Affected areas are returned to the original undisturbed conditions to the fullest extent possible. b. Prevent continuing impacts from contaminants and wastes on the environment including those associated with acid rock drainage; c. Remove all hazardous materials and waste and as much salvageable waste as practicable from the Project area; and d. Enter into written arrangements with its abandonment and reclamation contractors to ensure all site debris is cleaned up off the lands, including wind-blown debris.	Partially, Part B, Item 13 of NWB Water Licence (2AM- MEA1530). Partially, Conditions 12, 15, 16-19, 26 of Lease No. 66A/8-71-3 (covers the sections of the AWAR located on Crown land). Partially, Conditions 14, 17, 26, 34-38 of Lease No. 66A/8-72-6 (covers the quarries located on Crown land).

T&C#	NIRB Project Certificate No. 004	Implemented in Licences or Permits
80	Cumberland shall file annually with NIRB's Monitoring Officer an updated report on progressive reclamation and the amount of security posted, as required by KivIA, CIRNAC, and/or the NWB.	Does not incorporate filing to the NIRB's Monitoring Officer, but does refer to reporting on progressive reclamation and security: Partially, Conditions 19 (bi-annual reporting requirement), 20, and 33 of Lease No. 66A/8-71-3 (covers the sections of the AWAR located on Crown land). Partially, Conditions 24 and 38 of Lease No. 66A/8-72-6 (covers the quarries located on Crown land).

Appendix B. Whale Tail Pit Project Certificate T&Cs incorporated into any permits, certificates, licenses or other approvals issued for the Project

T&C#	NIRB Project Certificate No. 008	Implemented in Licences or Permits
2	Prior to commencing construction activities the Proponent shall update the existing Dust Management and Monitoring Plan for the Meadowbank Mine site to address and/or include the following additional items: • Align plan requirements with commitments made in the Final Environmental Impact Statement and during the Final Hearing to monitor dust along the existing all-weather access road, the Amaruq haul road and any other roads and trails associated with the Project. • Verify commitments to the utilization of dust suppressants along the all-weather access road, the Amaruq haul road and any other roads and trails associated with the Project, including a description of the type of suppressant to be utilized and the frequency and timing of applications to be made throughout the various seasons of road use. • Outline the specific triggers, thresholds, and adaptive management measures that will apply if monitoring indicates that dust deposition is higher than predicted.	Part F, Item 12 of NWB Water Licence (2AM-WTP1830)
6	The Proponent shall conduct detailed hydrodynamic modelling during operations and closure to evaluate the mixing of the Waste Rock Storage Facility seepage into Mammoth Lake post-closure; and Based on the results of the modelling implement monitoring programs and adaptive management strategies that minimize the need for active intervention, including long-term treatment of mine contact water.	Part E, Item 8 of NWB Water Licence (2AM-WTP1830)
9	The Proponent shall undertake the additional site-specific geotechnical investigations required to identify sensitive land features and to inform final engineering design prior to the construction of project components such as the waste rock storage facility and quarries.	Part D, Item 2 of NWB Water Licence (2AM-WTP 1830)
11	The Proponent shall develop and implement an Erosion Management Plan to prevent or minimize erosion and its resulting effects from project-related land disturbance.	Lease 66H/8-02-2 Whale Tail Haul Road (lease clauses 32 and 33) Lease 66H/8-01-4 Whale Tail Haul Road Quarries (lease clause 41)
12	As part of the Closure and Reclamation Plan, the Proponent shall develop and implement a program to: a. Progressively reclaim disturbed areas within the project footprint, with an emphasis on restoring the natural aesthetics of the area through re-contouring to the extent practicable; and b. In a manner that demonstrates that the Proponent has considered the aesthetic values of local communities (e.g. information regarding the acceptability of the topography and landscape of the project areas following progressive reclamation efforts).	Part J, Item 2 of NWB Water Licence (2AM-WTP 1830) Lease 66H/8-02-2 Whale Tail Haul Road (lease clause 23) Lease 66H/8-01-4 Whale Tail Haul Road Quarries (lease clause 33)
13	The Proponent shall explore the feasibility of topsoil/organic matter salvage as part of project development and provide updates to the Closure and Reclamation Plan based on this investigation.	Part J, Item 3 of NWB Water Licence (2AM-WTP 1830)

T&C#	NIRB Project Certificate No. 008	Implemented in Licences or Permits
15	Subject to the additional direction and requirements of the Nunavut Water Board, the Proponent shall prepare and implement a Groundwater Monitoring Plan that, at a minimum includes: • The collection of additional site-specific hydraulic data (e.g., from new monitoring wells) in key areas during the pre-development, Nunavut Impact Review Board Page 23 of 49 Project Certificate No. 008 construction and operation phases; • Definition of vertical and horizontal groundwater flows in the project development areas; • Delineates monitoring plans for both vertical and horizontal ground water; and • Thresholds that will trigger the implementation of adaptive management strategies that reflect site- specific conditions encountered at the project site.	Part I, Item 1e of NWB Water Licence (2AM-WTP 1830)
16	Within two years of commencing operations, the Proponent shall: a. Conduct additional analyses to determine the approximate fill time for the Whale Tail Pit at closure; b. Undertake a hydrogeological characterization study to assess the potential for arsenic and phosphorous diffusion from submerged Whale Tail pit walls; c. If the results of the characterization study indicate a moderate to high potential for arsenic and/or phosphorous diffusion, perform detailed hydrodynamic modelling of the flooded pit lake prior to closure to evaluate meromictic conditions and flooded pit water quality; and d. Add these required activities to the site Groundwater Monitoring Plan.	Part E, Item 7 of NWB Water Licence (2AM-WTP1830)
17	The Proponent shall: a. Monitor the effects of project activities and infrastructure on surface water quality conditions; b. Ensure the monitoring data is sufficient to compare the impact predictions in the Environmental Impact Statement (EIS) for the Project with actual monitoring results; c. Ensure that the sampling locations and frequency of monitoring is consistent with and reflects the requirements of the Water Quality and Flow Plan and the Core Receiving Environmental Monitoring Program; and d. On an annual basis, the Proponent will compare monitoring results with the impact assessment predictions in the EIS and will identify any significant discrepancies between impact predictions and monitoring results.	Part D, Items 10-14 of NWB Water Licence (2AM-WTP1830)

T&C#	NIRB Project Certificate No. 008	Implemented in Licences or Permits
18	The Proponent shall, reflecting any direction from the Nunavut Water Board, maintain a Site Water Monitoring and Management Plan designed to: • Minimize the amount of water that contacts mine ore and wastes; • Appropriately manage all contact water and discharges to protect local aquatic resources; and • Implement water conservation and recycling to maximize water reuse and minimize the use of natural waters. The Plan should include monitoring that demonstrates contact water (runoff and shallow groundwater) from the ore storage and waste rock storage areas is captured and managed, as per the Waste Rock Facility Management Plan.	Part E, Items 7-11 of NWB Water Licence (2AM-WTP1830)
19	The Proponent shall, reflecting any direction from responsible authorities such as the Nunavut Water Board, Fisheries and Oceans Canada and Environment and Climate Change Canada, maintain a Core Receiving Environment Monitoring Program (CREMP) designed to: • Determine the short and long-term effects in the aquatic environment resulting from the Project; • Evaluate the accuracy of Project effect predictions; • Assess the effectiveness of mitigation and management measures on Project effects; • Identify additional mitigation measures to avert or reduce environmental effects due to Project activities; • Comply with Metal Mining Effluent Regulations requirements, should an Environmental Effects Monitoring program be triggered; • Reflect site-specific water quality conditions; ▪ Include details comparing the watershed features in the Whale Tail watershed to those watersheds used as reference lakes; and • Evaluate the mixing and non-mixing portion of the pit. The CREMP should include sufficient sampling and monitoring programs to appropriately characterize the receiving environment to ensure that adequate data is available to assess impact predictions made within the Environmental Impact Statement for the Whale Tail Pit Project.	Part E, Items 7-11 of NWB Water Licence (2AM-WTP1830)
20	Unless otherwise authorized, the Proponent shall maintain an appropriate setback distance between project quarries and borrow pits from fish-bearing or permanent waterbodies as required to prevent acid rock drainage or metal leaching into such waterbodies.	Part I, Item 1 of NWB Water Licence (2AM-WTP1830) Lease 66H/8-01-4 Whale Tail Haul Road Quarries (lease clause 54)
21	The Proponent shall ensure that all project infrastructures in watercourses are designed and constructed in such a manner that they do not unduly prevent or limit the movement of water or fish species in fish bearing streams and rivers, unless otherwise authorized by Fisheries and Oceans Canada.	Part E, Item 25 of NWB Water Licence (2AM-WTP1830)

T&C#	NIRB Project Certificate No. 008	Implemented in Licences or Permits
22	The Proponent shall engage with Fisheries and Oceans Canada to develop project specific thresholds, mitigation and monitoring for any blasting activities that would exceed the requirements of Fisheries and Oceans Canada's Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters.	Part I, Item 1 of NWB Water Licence (2AM-WTP1830)
24	The Proponent shall engage Fisheries and Oceans Canada, and other interested parties to further assess: • Whether the increased surface area of Whale Tail Lake is a viable offset to habitat losses resulting from development of the Project; and • Whether Whale Tail end pit would support fish in the post closure scenario. Results of this assessment should be incorporated into the Habitat Compensation Plan and/or the Conceptual Fisheries Offsetting Plan as appropriate.	Part I, Item 1 of NWB Water Licence (2AM-WTP1830)
26	The Proponent shall include revegetation strategies within its Mine Closure and Reclamation Plan that support progressive reclamation, and promote natural revegetation and recovery of disturbed areas compatible with the surrounding natural environment. These strategies should include exploration of the feasibility and practicality of topsoil/organic matter salvage through Project development. Consideration for the results of similar reclamation efforts at other northern projects, including the Meadowbank Gold Mine Project, must be demonstrated.	Part J, Item 8 of NWB Water Licence (2AM-WTP1830)
31	The Proponent shall develop and implement a Road Access Management Plan and maintain traffic monitoring logs along the haul road between the Whale Tail Pit project and the Meadowbank mine. Where traffic exceeds levels predicted within the Environmental Impact Statement, the Proponent shall develop and implement appropriate modifications to its wildlife protection measures.	Lease 66H/8-02-2 Whale Tail Haul Road (lease clauses 54 and 60)
56	The Proponent shall report any archaeological site discovered during the construction, operation, and closure phases to the Government of Nunavut – Department of Culture and Heritage and the Kivalliq Inuit Association. Upon discovering an archeological site, the Proponent shall: a. Take all reasonable precautions necessary to protect the site until further direction is received from the Government of Nunavut – Department of Culture and Heritage; and b. If it becomes necessary to disturb an archaeological site, the Proponent shall consult with the Government of Nunavut – Department of Culture and Heritage, the Kivalliq Inuit Association, and potential impacted communities to establish a site specific mitigation plan, and obtain all necessary authorizations and comply with all applicable laws.	Lease 66H/8-02-2 Whale Tail Haul Road (lease clause 74) Lease 66H/8-01-4 Whale Tail Haul Road Quarries (lease clause 66)

T&C#	NIRB Project Certificate No. 008	Implemented in Licences or Permits
66	The Proponent shall operate the Whale Tail haul road as a private access road, implement any reasonable measures to limit public access to the road, and develop strategies that account for unauthorized use. These measures must include, but are not limited to, the following: a. The posting of signs in English and Inuktitut at the gate, each major bridge crossing, and each 10 kilometers of road, stating that public use of the road is prohibited; b. Annually advertise and hold at least one community meeting in the Hamlet of Baker Lake to explain to the community that the road is restricted to mine use only; c. Place local notices (e.g., radio, television, social media) at least quarterly to explain to the community that the road is restricted to mine use only; d. Record all unauthorized non-mine use of the road, and require all mine personnel using the road to monitor and report unauthorized non-mine use of the road; and e. Develop management strategies to ensure public and operator safety in the event of unauthorized public use.	Lease 66H/8-02-2 Whale Tail Haul Road (lease clauses 61, 62, 63 and 64)