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Prairie & Northern Region  
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ECCC File: 6100 000 008/002  
NIRB File: 03MN107 and 16MN056



June 11, 2026

via email at: [info@nirb.ca](mailto:info@nirb.ca)

Calvin Ehaloak  
Acting Public Registry Manager  
Nunavut Impact Review Board  
29 Mitik Street  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

Dear Calvin Ehaloak:

**RE: 03MN107 and 16MN056 – Agnico Eagle – Meadowbank and Whale Tail – 2025 Annual Report**

Environment and Climate Change Canada (ECCC) has partially reviewed the information submitted to the Nunavut Impact Review Board (NIRB) by Agnico Eagle (“the Proponent”) regarding the above-mentioned annual report.

ECCC provides expert information and knowledge to project assessments on subjects within the department’s mandate, including climate change, air quality, water quality, biodiversity, environmental emergencies preparedness and responses. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent’s characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

**Please note that ECCC has reviewed the annual report in consideration of species at risk under the *Species at Risk Act*, migratory birds under the *Migratory Birds Convention Act*, spills and environmental emergencies, and has not reviewed in consideration of water quality, air quality, or mining issues. The absence of comments on the latter topics is not an indication of an absence of concerns from ECCC.**

The following comments are provided:

**1. Spill cause details**

**Reference:**

- 260331-03MN107, 16MN056-2025 Annual Report-IR2E.pdf, Table 7-2 to 7-5, p.102 to 115

**Comment:**

While Tables 7-2 to 7-5 provide high-level descriptions of the cause of spill events, the information provided does not clearly identify the circumstances or sequence of events leading to the releases (e.g., a forklift punctured a tote due to human error and resulted in the complete release of the content on the ground). As currently presented, it is difficult to fully understand how the spills occurred and assess whether appropriate measures are in place to minimize the likelihood of reoccurrence.

**Recommendation:**

ECCC recommends that the Proponent provide additional contextual information for reported spill events, including a brief description of the sequence of events and circumstances leading to the release. Providing this information in future annual reporting would support a more comprehensive understanding of accident and malfunction events and help inform the assessment of mitigation measures intended to reduce the potential for similar occurrences in the future.

ECCC further recommends that the Proponent append copies or summaries of reportable spill incident reports to future annual reports, consistent with practices observed for other major projects (e.g., Meliadine Mine Project). Inclusion of this information would improve transparency and facilitate the assessment of trends, recurring issues, and the effectiveness of mitigation measures.

**2. Fuel tank farm secondary containment****Reference:**

- 260331-03MN107 16MN056-2025 Annual Report-App 7 Meadowbank and Whale Tail Geotechnical Inspection Report Pt1-IR2E; Section 9.1, p.66-67
- 260331-03MN107 16MN056-2025 Annual Report-App 22 Meadowbank and Whail Tail Spill Contingency Plan V24-IR2E; Appendix A, pdf p.74/229
- 260331-03MN107 16MN056-2025 Annual Report-App 7 Meadowbank and Whale Tail Geotechnical Inspection Report Pt2-IR2E; tank farm maps, pdf p.3-4/66
- 260331-03MN107 16MN056-2025 Annual Report-App 7 Meadowbank and Whale Tail Geotechnical Inspection Report Pt5-IR2E, Appendix G, p. G-1 to G-26
- 260331-03MN107 16MN056-2025 Annual Report-App 10 Meadowbank and Whale Tail Geotechnical Recommendation Implementation Plan-IR2E

**Comment:**

The geotechnical inspection identified multiple deficiencies associated with the secondary containment systems, including exposed liner, water accumulation, evidence of elevated water levels, and holes or tears in the liners. Maintaining secondary containment systems in good condition and preserving sufficient containment capacity are important to ensure that these systems can function as intended in the event of a major release.

ECCC notes that while the geotechnical report indicates that liner damage remained present at the Baker Lake tank farm in 2025 (Geotechnical Inspection Report Part 1, Table 13-1, p.83), the implementation plan indicates that repairs to holes and tears at the Baker Lake fuel farm were completed in 2026 (pdf p.2-3).

**Recommendation:**

ECCC recommends that the Proponent monitor the condition of secondary containment systems at fuel storage areas and undertake timely repairs or corrective actions where deficiencies are identified to ensure that the adequacy and integrity of the containment systems are maintained.

ECCC notes that the Proponent has developed a weekly inspection template (appendix A) as part of the Spill Contingency Plan, which could serve as a useful mechanism to support the routine monitoring and documentation of the condition of secondary containment infrastructure.

If you need more information, please contact Anna Graham at [anna.graham@ec.gc.ca](mailto:anna.graham@ec.gc.ca).

Sincerely,

Anna Graham  
Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)