Intervening Party	Date	Ref.	Comment	Recommendation	AEM Response	AANDC Response
Environment Canada (EC)	14-Aug-15	General	The application indicates that during construction, all contact water will be diverted to flow to channel 2 and eventually collect in CP1. However, it is unclear how contact water will be managed prior to construction of diversion channel 2, as only construction is proposed in this application.		During initial construction the contact water from the plant site area will naturally flow or be diverted via channel 2 into pond H15E. Although the construction of the industrial pad will start in Yr-5, Channel 2 is only needed in Yr-4 once the industrial pad extends such that runoff from its surface is impacted.	
Environment Canada (EC)	14-Aug-15	Satelite Infrastructure	EC notes that the proposed mine site is located on a peninsula extending into Meliadine Lake, 25 km north of Rankin Inlet and 80 km southwest of Chesterfield Inlet. The distance of mine location is therefore 25 Km from the proposed Laydown Area and Bypass Road Laydown in Rankin Inlet. EC would like to remind the Proponent that, given that the proposed Laydown Area is 25 Km from the mine site, the Laydown Area would not be subject to the Metal Mining Effluent Regulations (MMER), rather it will be subject to the provisions of Subsection 36(3) of the Fisheries Act.	EC would like to remind the Proponent that, given that the proposed Laydown Area is 25 Km from the mine site, the Laydown Area would not be subject to the Metal Mining Effluent Regulations (MMER), rather it will be subject to the provisions of Subsection 36(3) of the Fisheries Act.	Agnico Eagle confirms their commitment to comply with all applicable regulations and legislation including the Fisheries Act and thanks Environment Canada for the clarification.	
Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	1. Executive Summary	The executive summary of the proposed work, presented in the Main Application Supporting Document, has not been translated into Inuktitut. Additionally, according to correspondence provided by Golder, the executive summary was not updated following some last minute changes.	Aboriginal Affairs and Northern Development Canada (AANDC) recommends that the applicant be requested to provide an Inuktitut version of the project's executive summary. This opportunity could be taken to update the summary.	Agnico Eagle has provided as attachment an updated Executive Summary in English and its Inuktitut translation.	AANDC is satisified that AEM has met this recommendation.
Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	2. Water Use for Camp Purposes	The application states that no direct water use is requested as water use for domestic purposes is authorised under water licence 2BB-MEL1424. This licence permits the use of 45 m3/day of water for camp or domestic uses. The existing site infrastructure includes an exploration camp, located on a peninsula in Meliadine Lake, which can accommodate 200 people. Fifty rooms will be added to the camp in order to accommodate 250 construction personnel. Since no increase in water for camp purposes has been requested, the available water per person per day will decrease by 25%. The 2014 Annual Report indicates use of 39 m3 of water per day for domestic purposes in June 2014 so it is not clear how there will be sufficient water for the camp if its size is increased by 25%.		Agnico Eagle is committed to provided appropriate domestic water to support its activities. A request for amendment to the authorized quantity of domestic water under licence 2BB-MEL1424 will be filed, if deemed necessary.	AANDC is satisified with AEM's response.
Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	3. Use of ramp rock to construct pad	needed to construct the infrastructure pad. The material is to come from two main sources: the ramp development waste rock and borrow pits B5 and B6A. In Section 3.2, when discussing source materials for satellite infrastructure construction, Agnico Eagle states that the quarries and	AANDC recommends that the applicant be required to apply the same ARD/ML standards for construction materials at the mine site as is used for satellite infrastructure or demonstrate how using potentially acid generating rock to construct the infrastructure pad will not adversely affect water quality.	Agnico Eagle confirms that the quarries and borrow pits selected for all infrastructure construction will be subject to visual examinations and if deemed necessary Acid Rock Drainage/Metal Leaching (ARD/ML) testing to confirm the best available building materials are used.	AANDC is satisified with AEM's response.

Aboriginal Affairs and	17-Aug-15	4. Water use - Installation	In constructing a portion of the infrastructure pad, two water	AANDC recommends that the applicant:	Clarification 1 - At the pre-development stage, Culvert 2 primary	
Northern Development			management structures will have to be constructed as well in order to	- explain the necessity of constructing the two water	function is as a drainage component of the service road. As mine	
Northern Development Canada (AANDC)		of culvert #2 and channel #2	manage contact water. The structures are culvert #2 and diversion channel #2 and are described in the Water Management Plan submitted with the Type "A" water licence application. The following two statements are made regarding channel #2 in Section 5.1:	diversion structures before the Water Management Plan can be evaluated as a whole; - clarify the intended purpose of culvert #2; and - provide plans of the proposed pad and drainage structures for review.	development progresses and significant construction is initiated following issuance of the Type A water Licence, Culvert 2 primary function is support of water management.  Clarification 2 - Calling channel 2 an diversion channel for noncontact water is an error copied from the Type A license application. The channel collects only contact water.  Clarification 3 - Agnico eagle is committed to provided the detailed design plans to the Board for review prior to construction.	According to section 5.1 of the main application document, contact water will flow via Channel 2 into ponds H15E, H15, H14, H13, and H12, and eventually collected in CP1. Therefore AANDC's Question is: What is planned for that water in this construction stage?
Aboriginal Affairs and Northern Development Canada (AANDC)		5 5. Tank farm construction at Itivia 5 6. Contact water	The construction of a fuel tank farm with a containment berm is planned and may be included in pre-development construction. No plans have been provided for the containment structure.  The Main Application Supporting document states that if the fuel tank	AANDC recommends that the applicant provide the plans for the fuel tank farm for review before construction.  AANDC recommends that if the licence includes the possibility	Agnico Eagle is committed to providing the final design plans and for construction drawings for the fuel tank farm to the NWB at least 60 days prior to construction for the Boards approval  Agnico Eagle is committed to providing the information requested by	AANDC is satisified with AEM's response.
Northern Development Canada (AANDC)		discharge	farm containment area is constructed as part of pre-development, inspections will be done to ensure no water overflows into the environment and "prior to discharge, accumulated water in the	of constructing the tank farm containment area planned in Itivia, it include a discharge location, a monitoring program station and discharge criteria for the water discharged from the containment area.	AANDC with the final design plans which will include a monitoring and mitigation program once final specific locations are known for	AANDC is satisified with AEM's response and look forward to reviewing any further submissions.

Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	Agnico Eagle will not construct two landfills and "proposes to relocate the landfill authorized under 28B-MEL1424 and construct the temporary landfill in the location proposed in the Type A Water Licence." The term temporary is not defined. If the term temporary means that the material will be moved at a later date, this can be	what a temporary landfill is, specifically, if the material will be moved at a later date and what construction design is	Construction and operation of a landfill is authorized under water licence 2BB-MEL1424. In the NWB decision of July 22,2014 Amendment No. 4 to water licence 2BB-MEL1424 the landfill was referred to as a "temporary" landfill for the disposal of solid, non-hazardous waste associated with advanced exploration activities. In	
		problematic if waste asbestos is to be landfilled, as described the management plans. According to the management plan, "leachate from the landfill is anticipated to be of very low ionic strength, and as a result site-specific landfill leachate management is not considered to be required." Additionally, the landfill will be located in a future tailing/waste rock area, which will "allow any leachate that may be generated to be collected, monitored and managed." The timing of construction of the landfill relative to the remainder of the waste storage area is not clear, therefore it is not possible to determine if the leachate and runoff collection systems will be in place when needed. AANDC believes the "typical design section" presented in Figure 1-2 of Version 4 of the Landfill and Waste Management Plan is an improvement over that presented in Version 2, Figure 4-1, because it includes a layer of liner bedding till which will impede the flow of leachate.		the Board decision of July 22, 2014 it was confirmed that the  "temporary" non-hazardous landfill had "not been established yet".  To minimize potential impacts to the environment, Agnico Eagle  proposes to change the location of the landfill authorized under 2BB- MEL1424 and construct single landfill in the location proposed in the  Type A Water Licence. The monitoring and reporting for the Landfill  will comply with the license terms and conditions already  established under 2BB-MEL1424 for the purpose of this  predevelopment application. Agnico Eagle will comply with all  landfill monitoring requirements as stipulated in the licence 2BB- MEL1424. Upon issuance of the Type A water licence the landfill  terms and conditions of the Type B will be integrated into the Type A  licence.  Agnico Eagle is committed to providing the Board with a revised  "Meliadine Gold Project Landfill Design and Management Plan" at	
				least 60 days prior the construction of the facility. Agnico Eagle will provide as built plans and drawings of the modifications within ninety (90 days) of the completion of the modification.	
				The leachate from the proposed landfill is anticipated to be of very low ionic strength (dilute) due to controls on materials to be placed in the landfill, and, as a result, site-specific landfill leachate management is not considered necessary. Moreover, drainage from the landfill is largely expected to freeze within the WRSF with little to none reporting to the water collection infrastructure placed around the WRSF. In the event there is leachate from the landfill due to periods of heavy rainfall or spring freshet, the runoff will be collected, controlled and treated, if necessary. In order to do that, the monitoring station MEL-8 be relocated appropriately. AEM to confirm location of this monitoring station during predevelopment AEM to confirm the plan to manage the effluent (if any) prior CP1 AEM to confirm how the construction will be done (if 1.2m of waste rock are required as a foundation) in the submission of the final design plan.	AANDC is satisified with AEM's response and looks forward to any reviewing any updates with regards to the plan.

Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	8. Spill contingency plan	Some of the contact names and numbers are out of date, as is the inventory in appendix B.	AANDC recommends that Spill Contingency Plan include the following modifications:  - p. iii: Change contact information for AANDC personnel o from Henry Kablalik to Christine Wilson o from Peter Kusugak to Erik Allain: Erik. Allain@aandc-aadnc.gc.ca, phone (867) 975-4295, fax (867) 975-6445  - p. 13: Only two contacts are required under Aboriginal Affairs and Northern Development Canada and they are the same as on page iii.  O Nunavut Field Operations (867) 975-4295  o Water Resource Officer, Rankin Inlet (867) 645-2830  - p. 19 & p. 21: the 24-hour NWT/NU Spill Report Line phone number is (867) 920-8130 rather than the (403) number found in the document  - Update the response equipment inventory in appendix B so that it is current.	Agnico Eagle acknowledges that contact information is periodically out of date and thanks AANDC for provided updated information. Agnico Eagle is committed to revise the Spill contingency Plan within the time period defined in the water licence after issuance of the water licence to ensure the information is accurate and up to date for the pre-construction phase.	AANDC is satisified with AEM's response.
Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	plan	Both the Management Plan and the Main Application Supporting Document state that "the reclaimed quarries and borrow pits will have gently sloping walls and positive drainage wherever possible." If the drainage at a reclaimed quarry is not positive, a pit lake will likely form, which could lead to permafrost degradation and thermokarsting.	reclaimed quarries have positive drainage.	Agnico Eagle acknowledges that the preferred closure objective is to divert water away from a borrow pit or quarry to prevent formation of a lake. Agnico Eagle proposed to use only the top portion of the esker hills therby ensuring positive drainage.	AANDC is satisified with AEM's response.
Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	•	According to the comments presented in the table of project specific information requirements (PSIR) in the concordance assessment, the applicant believes several of the Nunavut Impact Review Board (NIRB) conditions are not yet applicable at this stage of pre-development. AANDC does not agree in all cases. The following table lists those conditions which we believe should be considered for this Type "B" licence.	AANDC recommends that the applicant be required to fulfil the NIRB certificate conditions relevant to the work they propose to begin with this Type "B" licence application.	issued by NIRB taking into account the appropriate scale and scope of activities requested by the Type B application. It is Agnico Eagle view that the proposed activities do not constitute "significant construction" for this stage of project development. Significant construction will only occur upon issuance of the Type A water licence.	AANDC recommends that the NIRB and/or NWB render a decision as to whther or not these terms and conditions are applicable at this stage od the project. AANDC stands by its initial comments in that AANDC believes that the terms we have listed are revelant for the purpose of this type B water licence. Also AANDC would like clarification on what is meant by "significant construction"?

NIRB condition: 1 Project phase: pre-construction Applicant's comment: n/a for pre-development stage as presented in this Application AANDC comment: The term and condition f. is baseline data collected prior to significant construction activity, so updating a plan and initiating monitoring seems appropriate.	As stated above, it is Agnico Eagle view that the proposed activities do not constitute "significant construction" for this stage of project development. Significant construction will only occur upon issuance of the Type A water licence. Prior to significant construction AEM, will initiate monitoring. Air Monitoring is ongoing as part of the Type B water licence for the exisitng Meliadine road. In addition in compliance with the PC, Agnico Eaglewill be submitting a revised Air Quality Monitoring Plan.  AANDC recommends that the NIRB and/or NWB render a decision as to whither or not these terms and conditions are applicable at this stage od the project. AANDC stands by its initial comments in that AANDC believes that the terms we have listed are revelant for the purpose of this type B water licence. Again AANDC would like clarification on what is meant by "significant construction"?
NIRB condition: 3 Project phase: pre-construction Applicant's comment: Should dust be generated for any roads associated with pre- development, water for dust suppression will be sourced under existing AWAR water licence.  AANDC comment: The term and condition begins with "prior to commencing construction activities" so this early construction stage seems appropriate for defining plans to monitor dust deposition arising from the road.	If water is needed for dust suppression during pre-development and site preparation, Agnico Eagle will use water sources authorized under water licence 8BW-MEL1215. The existing Type B licence authorizes a total of 200 m³ per day of water for the purpose of road watering. AEM is required to install flow meters or implement other suitable devices to measure the volume of water used.  Under the NIRB Project Certificate (No.006), Term and Condition No.3; Agnico Eagle is required to update its Dust Management and Monitoring Plan prior to construction activities to include commitments made in the FEIS and Final Hearing to monitor dust along the AWAR, verify commitments to the utilization of dust suppressants, and outline specific adaptive management measures to be considered should monitoring indicate that dust deposition is higher than predicted. The Dust Management and Monitoring Plan will be updated and submitted to NIRB to the prior to the start of preconstruction activities.
	Dust monitoring currently proposed includes:  - Conduct weekly inspections of the road for excessive dust generation, during periods when the roads are very dry and/or under heavy traffic conditions.  - Dustfall measurements will be collected regularly along the roads and other parts of the mine site using passive sampling methods to record the quantity of dust collected over time, and to allow the success of mitigation measures to be quantified.  Further details on dust management for the site can be found in the Dust Management and Monitoring Plan, provided in Appendix A of the Roads Management Plan. Dust suppression measures are provided in Section 6.

			NIRB conditions: 12 & 17 Project phase: pre-construction Applicant's comment: n/a for pre-development stage as presented in this Application AANDC comment: Condition 12 requires further permafrost mapping in the Project development area, and some of this data will have to be gathered before building the infrastructure pad and beginning to divert watercourses, as proposed in this licence application. Condition 17 also relates to permafrost and requests monitoring the effects of the Project, including all-weather access road and quarries. Since these project components are already in use, it would be appropriate to monitor their effect.		AEM proposes to conduct further permafrost mapping prior to significant construction activities and after issuance of a Type A Water Licence. AEM has committed to installing thermistors in the Tailings Storage Facility and Waste Rock Storage Facilities as part of the Type A Water Licence application to monitor rate of freeze back and permafrost development. Roads and quarries will be visually inspected on an ongoing basis. Additional permafrost mapping has been undertaken after the FEIS was completed along with geotechnical investigation (i.e condition 13 in 2013 and 2014) this information will be submitted to NIRB with the next Annual report to comply with PC.	AANDC is satisified with AEM's response.
			NIRB condition: 27 Project phase: pre-construction Applicant's comment: n/a for pre-development stage as presented in this Application AANDC comment: The term and condition a. requires collection of adequate baseline data at Meliadine Lake prior to and during construction activities, so the pre- development stage would be an appropriate time to update the Aquatic Effects Monitoring Plan and begin data collection.		Agnico Eagle would confirm that the AEMP has been updated for the purposes of the Type A water licence application. Since the issuance of the project certificate additional baseline data collection has been undertaken in Meliadine Lake for water quality, benthic, plankton and fish tissue. Agnico Eagle believes the assessment of and evaluation of the AEMP program is more appropriately undertaken as part of the Type A water licence process and is committed to providing a summary of the additional baseline data collected and proposed to be collected in 2016 in advance of significant construction, during the Type A Water licence process.	AANDC is satisified with AEM's response.
			NIRB condition: 32 Project phase: pre-construction Applicant's comment: Refer to the Road Management Plan submitted in support of this Application AANDC comment: The Road Management Plan does not address site drainage and silt control. As the applicant is proposing to construct diversion channel #2 and culvert #2 to control drainage around the infrastructure pad they will construct, they should provide the requested Site Drainage and Silt Control Plan.		The Road Management Plan Section 7.1 refers to sedimentation control measures to be implemented during construction.	AANDC's concern here was runoff from the pad during freshet or major rain events. Comment remains
			NIRB condition: 33 Project phase: pre-construction Applicant's comment: n/a for pre-development stage as presented in this Application AANDC comment: There will be blasting in the quarries and the ramp, and it should meet the appropriate guidelines.		Agnico Eagle is committed to meeting or exceeding the guidelines set by Fisheries and Oceans Canada as required by the NIRB project certificate condition 33.	AANDC is satisified with AEM's response.
Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	11. Security	The applicant proposes that "the NWB defer full consideration of security of project liability to the Type A Water Licence", but has included an estimate of financial liability for pre-development works and site preparation. The total estimated reclamation cost is of 1 052 718\$.	AANDC recommends that security be held for the Type "B" licence. We recommend that the applicant clarify how all the reclamation activities and all project components are adequately covered in the security cost estimate, revising it if necessary.	The security estimate submitted with the application details the costs associated with pre-development as proposed in the Application.	AANDC is satisified with AEM's response.

In Section 3.0, the scope of development works includes stripping of open pits (overburden and waste rock) and ore/waste rock stockpiling. This work is not included in either the general application document or the main application supporting document so it is not logical to include it in this reclamation document.	Agncio Eagle confirms that the Executive Summary and Section 3.1 of the main application supporting document mention that stripping of open pits and ore/waste rock stockpiling are not requested as part of this Type B application. The previous statement is consistent with the statement presented in Section 3 of the Type B closure and reclamation document. These activities have not been included in the financial security cost estimate.	AANDC is satisified with AEM's response.
The closure and reclamation activities in Section 5.0 do not include the dismantling of the fuel storage facility to be constructed in Itivia. In Section 3.0, the applicant states that it does not anticipate constructing the facility at this stage but wants it included in the licence for flexibility. AANDC believes that if it is included in the licence, it should be included in the reclamation cost estimate.	Agnico Eagle confirms that As the detailed engineering drawings for the fuel storage facility have not been carried out (they will be if the facility is required), the reclamation cost for this facility has been included in the overall financial security contingency at this time (20%). The financial security may be amended if the fuel storage facility is finally needed. In any event the security estimate for the fuel storage facility will be included in the Type A application.	AANDC recommends that security for the tank farm facility be costed out in the reclaim model as the applicant wants it included in the licence.
The closure and reclamation activities include the disposal of inert non-hazardous material in the landfill area. Since there is no landfill presently constructed on the project site, and the landfill proposed in this application is to be temporary, it seems as if the reclamation work would have to include construction of a permanent landfill.	No solid waste disposal is proposed under this Application. Any wastes generated will be back hauled to an approved waste disposal facility. Minimal amounts of solid waste generated as a result of works in Rankin Inlet will be disposed of in the Hamlet Landfill. In the vicinity of the proposed mine site, solid waste and hydrocarbon contaminated waste (if any) shall be disposed of as authorized by water licence 2BB-MEL1424. Refer to Section 3.6 and Table 6.1 of the main application supporting document for additional clarification. (Also see response to comment # 7 above)	AANDC is satisified with AEM's response.
It is not clear how the costs of several of the closure and reclamation activities listed in Section 5.0 are included in the cost estimate. These include:  - An assessment will be carried out to identify areas where soils may be contaminated by hydrocarbons. Contaminated soils will be excavated and hauled off site or managed as described under the authorized water license 2BBMEL1424 which authorizes the use of an existing landfarm.  - Hazardous wastes will be removed for disposal by a licensed handler.  - Fuel not required during the closure and reclamation activities will be will be sold, returned to suppliers, disposed by a licensed handler, or incinerated.	Agnico Eagle would confirm these activities have been included in the overall financial security contingency (20%). Since the cost of these activities is expected to be minimal at this stage of predevelopment.	AANDC recommends the applicant provide security for these activities, given that the applicant wants them included in the licence. It is also AANDC's understanding that once security has been totalled for a project then contingency would be a separate line item of 20% of that total. Contingency is supposed to be for the unexpected events and not for whether or not these activities happen. If these activities are to be included in the licence then security for these activities is warrented.

			The cost estimate does not include any care and maintenance between the abandonment of the site and its reclamation. This period typically lasts several years as parties sort out responsibilities and AANDC believes 3 years of care and maintenance should be added to the reclamation cost estimate.	In adherence to the NU Mine Site Reclamation Policy Agnico Eagle is committed to "ensuring the site is left in a condition which will minimize or eliminate long-term care and maintenance requirements." A detailed estimate is provided with a 20% contingency which can account for for any Care and Maintenance.	AANDC recommends that the applicant provide a security amount for Care and Maintenance, dismantling fuel farm, site assessment for contaminants and removal of hazardous wastes and extra fuel.  AANDC is of the understanding that these items belong as separate line items when developing a security cost estimate and do not belong under Contingency as the applicant has done.
			AANDC agrees with the applicant that if a Type "A" water licence is issued in the future, the Board should incorporate the security required for this Type "B" licence application to avoid double bonding.	Agnico Eagle acknowledges AANDC agreement if a Type A water licence is issued in the future, the Board should incorporate the security required for this Type "B" application to avoid double bonding.	AANDC is satisified with AEM's response.
Aboriginal Affairs and Northern Development Canada (AANDC)	17-Aug-15	C. CONCLUSION	With consideration of the comments submitted, AANDC deems this application to be receivable. The most significant outstanding points are the security cost estimate and avoiding project parcellation when considering project water and drainage structures.	No response required.	AANDC is satisified with AEM's response.