



Environment  
Canada

Environnement  
Canada

Environmental Protection Operations Directorate (EPOD)  
Prairie and Northern Region (PNR)  
P.O. Box 1870  
Iqaluit NU X0A 0H0

June 23, 2014

EC file: 6100 000 010  
NIRB file: 03MN107

Kelli Gillard, Technical Advisor & Doris North Project Monitoring Officer  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay NU X0B 0C0

Via e-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Attention: Kelli Gillard

**RE: Comment Request for TMAC's 2013 Annual Report for Doris North Gold Mine Project Certificate NIRB No. 003.**

Environment Canada (EC) has reviewed the 2013 Annual Report for Doris North Gold Mine (the Report), submitted by TMAC Resources Inc. (the Proponent) to the Nunavut Impact Review Board (NIRB), in response to the NIRB's correspondence dated May 27, 2014. EC's comments on the Report and on monitoring of the Doris North Gold Mine Project (the Project) are included below. EC's specialist advice is provided pursuant to the *Canadian Environmental Protection Act 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Comments on Effects Monitoring

1. In the Hope Bay Seepage Monitoring Program section of the Report, the statement "The majority of this seepage is captured in the water management system implemented at Hope Bay" (Page 36) should be clarified to indicate whether proper treatment of the seepage has occurred before it escapes into the environment.
2. The Report provides a 3 page summary of the Aquatic Effects Monitoring Program (AEMP) results, and no information on methods nor how conclusions were reached (i.e. no data). This makes it difficult to evaluate whether the conclusions reached are valid, and to see whether there are areas warranting further study or changes to the program. In 2013 a fairly comprehensive AEMP report was produced for 2012 monitoring which included methods, data, rationale and interpretation, so EC is disappointed by the lack of a 2013 AEMP.

Given the proposed changes to the Project (e.g. marine discharge, extended footprint) it would have been reasonable to focus more on the new marine discharge area. Some of that might have been done, but it cannot be ascertained from the summary provided. EC requests that the Proponent provide a comprehensive AEMP along with the annual report for the Project in 2014.

Comments on Compliance Monitoring



3. No inspections of the Project were completed by EC during the 2013 calendar year, and no non-compliance with the *Fisheries Act* or with the *Canadian Environmental Protection Act, 1999* were identified by information from other sources such as complaints or the NT/NU Spill Line.

For further clarification on any aspect of this submission, please contact Michael I. Mohammed at (867)-975-4981 or [michael.mohammed@ec.gc.ca](mailto:michael.mohammed@ec.gc.ca).

Sincerely,



Michael I. Mohammed  
Senior Environmental Assessment Coordinator

cc: Carey Ogilvie, Head Environmental Assessment North (NT & NU), PNR-EPOD  
EC Internal Distribution  
Lilianne Arsenault; Project Manager, Impact Assessment, Environment  
Protection; Government of Nunavut