



**NIRB File No.: 05MN047**

NWB File No.: 2AM-DOH1323

ECCC File No.: SOR/2008-216

DFO File No.: 07-HCAA-CA7-00117, NU-02-0117.2, NU-02-0117.3 & NU-10-0028

INAC File No.: 077A03001 & 77A3-1-2

TC File No.: 8200-02-6565

October 31, 2018

Oliver Curran  
Vice President Environmental Affairs  
TMAC Resources Inc.  
95 Wellington Street West Suite 1010  
P.O. Box 44  
Toronto, ON M5J 2N7

Sent via email: [oliver.curran@tmacresources.com](mailto:oliver.curran@tmacresources.com)

**Re: The Nunavut Impact Review Board's 2017-2018 Annual Monitoring Report for the Doris North Gold Mine Project and Board's Recommendations**

---

Dear Oliver Curran:

The Nunavut Impact Review Board (NIRB or Board) is hereby releasing its *2017-2018 Annual Monitoring Report for the Doris North Gold Mine Project* (Monitoring Report) which includes the 2018 Site Visit and the 2018 Public Information Meeting Summary Reports for the NIRB's monitoring of the Doris North Gold Mine Project (Appendix B of the Monitoring Report). The enclosed Monitoring Report is based on the NIRB's monitoring activities as set out within the Doris North Gold Mine Project Certificate No. 003 and Sections 12.7.1 and 12.7.2 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)*. This report provides the findings that resulted from monitoring of this Project from October 2017 to September 2018.

By way of a motion carried during its regular meeting held in October 2018, the Board has issued the following recommendations to assist TMAC Resources Inc. (TMAC) in achieving compliance with the Doris North Gold Mine Project Certificate and to ensure the NIRB has all information necessary to adequately discharge its mandate with respect to provisions within Section 12.7 of the *Nunavut Agreement* as such pertain to the Doris North Gold Mine Project.

### Proponent's Reporting Requirements to the NIRB

In accordance with the Doris North Gold Mine Project Certificate No. 003 (Project Certificate) originally issued by the NIRB on September 15, 2006 and amended on September 23, 2016, TMAC Resources Inc. (TMAC) is to periodically provide reports on the environmental performance of the Project and updates of applicable management plans to the NIRB to inform the Board's compliance and effects monitoring responsibilities for the Project. The NIRB notes that, although TMAC is generally in compliance with these requirements, records of year-round monitoring of Doris Lake water levels were not included in the Proponent's 2017 Annual Report for the Project as per Term and Condition 36 in the amended Project Certificate No. 003, Amendment 02. TMAC makes reference to its submission(s) to the Nunavut Water Board regarding Doris Lake water levels in its 2017 Annual Report; however, the NIRB notes that submissions to other agencies or parties do not satisfy requirements of Term and Condition 36 of Project Certificate No. 003, Amendment 02.

**Recommendation 1:** The Board requires that TMAC confirm its intention to comply with the requirements of Term and Condition 36 of Project Certificate No. 003, Amendment 02, including providing records of its monitoring of Doris Lake water levels in annual reports to the NIRB moving forward.

TMAC is to provide confirmation within 30 days of receipt of the Nunavut Impact Review Board's recommendations and must include the monitoring records in its 2018 Annual Report submission to the Board.

### Dustfall Monitoring and Mitigation

TMAC notes in the summary of the post-environmental assessment monitoring program (PEAMP) in its 2017 Annual Report that summertime dustfall measurements at the Project site were above predictions made in the Proponent's 2005 Final Environmental Impact Statement for the Project. The NIRB has concerns about the potential implications of these air quality exceedances to the health of mine personnel and wildlife in the general project area.

**Recommendation 2:** The Board requires that TMAC update its Dustfall Monitoring Plan to address how it intends to reduce dustfall in the summer months below the predictions presented within the 2005 Final Environmental Impact Statement for the Project.

The updated plan should be submitted within 90 days of receipt of the Board's recommendations.

### Noise Abatement Plan – Project Noise Monitoring Program

TMAC notes in the summary of the post-environmental assessment monitoring program (PEAMP) in its 2017 Annual Report that it did not conduct monitoring of Project-related noise in 2017 and that, based on its updated Noise Abatement Plan (the Plan), Project-related noise monitoring is to be conducted at least once in each project stage or phase: preconstruction (baseline), construction, operation, and closure and reclamation. The NIRB has concerns with the frequency of noise monitoring as presented in the Plan. In the Board's view, limiting the frequency of noise monitoring to once per project phase may not provide representative data to inform the PEAMP and to allow for an accurate assessment of the impacts of Project noise on valued components,

including wildlife. The NIRB notes that the Government of Nunavut also expressed similar concerns in comments submitted to the Board following its review of TMAC's 2017 Annual Report.

**Recommendation 3:** The Board requires that TMAC consult with parties, including the Government of Nunavut-Department of Environment, as per Term and Condition 29 of Project Certificate No. 003, Amendment 02, to establish Project-related noise monitoring programs that ensure that data collected is representative of Project site conditions. An updated Noise Abatement Plan is to be provided to the NIRB by TMAC following the required consultation with parties.

TMAC is to include the updated Noise Abatement Plan in its 2018 Annual Report submission to the Board.

#### *Snowcat and Rimpull Trials – Land Restoration*

In 2012, the NIRB noted that experiments conducted by the previous proponent (Hope Bay Mining Limited) to assess the feasibility of vehicular travel on the tundra (snowcat and rimpull trials) resulted in tracks on the parcel of land adjacent to the laydown area in proximity to Quarry 2, which the NIRB recommended should be monitored and reported on an annual basis by the Proponent. In 2013, the Board requested that TMAC develop a monitoring and/or remediation plan for these tracks, which was submitted to the NIRB in April 2014. The NIRB notes that, although it observed evidence of TMAC's ongoing restoration activities to mitigate impacts to the tundra from the tundra vehicle trials during the 2018 Project site visit, a summary of these land restoration activities, including the effectiveness of implemented mitigation measures, was not included in TMAC's 2017 Annual Report.

**Recommendation 4:** The Board requires that TMAC include a summary of ongoing land restoration of tundra areas impacted by previous snowcat and rimpull trials in annual reporting to the Board.

TMAC is to include the requested information in its 2018 Annual Report submission to the NIRB.

#### *Project Site Sumps*

During the 2018 Project site visit, the NIRB staff observed dead wildlife (Arctic ground squirrel or siksik and small birds) in a plastic-lined sump within the newly constructed reagent pad and noted that such sumps, which have also been installed at various other locations within the Project footprint may continue to pose a hazard to wildlife, such as small birds and rodents.

**Recommendation 5:** The Board requires that TMAC install appropriately-sized screens or similar mechanisms on sumps within the Project area to prevent entrapment of small wildlife.

The Board requires a response in 30 days following the issuance of this recommendation.

### Wildlife Monitoring and Mitigation Program – Tailings Impoundment Area

As per Term and Condition 26 of Project Certificate No. 003, Amendment 02:

*The Proponent shall consult with local Elders, Kitikmeot Hunters and Trappers Organizations, the Nunavut Wildlife Management Board, Government of Nunavut-Department of Environment, Environment and Climate Change Canada, and the Nunavut Impact Review Board's Monitoring Officer to review and discuss the results of wildlife monitoring and develop mitigation measures, including measures to discourage wildlife and birds from coming into contact with the Tailings Impoundment Area and contaminated areas of the mill site. The Proponent shall incorporate a plan for this consultation into a reviewed Wildlife Monitoring and Mitigation Plan.*

TMAC noted in its 2017 Annual Report that it consulted with local Elders and land users in 2016 and 2017, including a meeting in the fall of 2017 to review results of long-term bird dataset analyses with relevant stakeholders; however, details on the stakeholders involved in these consultations were not provided by TMAC.

Considering that deposition of tailings in the tailings impoundment area (TIA) is ongoing, the NIRB remains concerned about the lack of clear triggers or thresholds to implement deterrence or mitigation measures for wildlife that may encroach on the TIA.

**Recommendation 6:** The NIRB requires that TMAC provide the following information in fulfillment of Term and Condition 26 of Project Certificate 003, Amendment 02:

- i. Details on completed or planned consultation with identified stakeholders, including summaries of input received with respect to wildlife-tailings interaction and mitigation.
- ii. Identification of updates to the wildlife monitoring program resulting from feedback received from consultation with stakeholders, including measures designed to address wildlife interactions with the tailings impoundment area (TIA) such as triggers or thresholds to initiate specific management responses. Measures designed in consultation with Environment and Climate Change Canada to address potential impacts of migratory bird interactions with the TIA should be highlighted.
- iii. Summaries of records of wildlife interactions with the TIA, including species types and numbers and period(s) of observations, should be included in annual reporting to the Board.

TMAC is to include the requested information in its 2018 Annual Report submission to the NIRB.

### Project Commitments

As per Terms and Conditions 1 and 2 of Project Certificate 003, Amendment 02, the Proponent is required to demonstrate compliance with commitments it made during the NIRB's review of the original project proposal and subsequent amendments to the project.

**Recommendation 7:** The NIRB requests that TMAC report on its efforts to engage with stakeholders to address its commitments for the Project, including the list of commitments appended to the Project Certificate, those commitments in the Final Hearing Report dated June 22, 2006 and the Public Hearing Report dated June 13, 2016.

The Board expects TMAC to provide sufficient evidence to demonstrate its compliance with all Project-related commitments in its 2018 Annual Report submission to the NIRB.

The Board respectfully requests that TMAC Resources Inc. provide a response within the timeline as requested for each of the recommendations.

Should you have any questions or require further clarification regarding this request or related to the NIRB's monitoring program for the Doris North Gold Mine Project, please contact the undersigned directly at (867) 983-4616 or [kboaantwi@nirb.ca](mailto:kboaantwi@nirb.ca).

Sincerely,



Kofi Boa-Antwi, M.Sc., R.P. Bio.  
Doris North Gold Mine Project Monitoring Officer  
Nunavut Impact Review Board

cc: Shelley Potter, TMAC Resources Inc.  
Alex Buchan, TMAC Resources Inc.  
Doris North Distribution List

Enclosure: The Nunavut Impact Review Board's *2017-2018 Annual Monitoring Report for the Doris North Gold Mine Project*