



# Overview

- Mandate
- Relevant Acts and Regulations
- Technical Comments and Recommendations



# Environment and Climate Change Canada's Mandate

- Preservation and enhancement of the quality of the natural environment, including water, air and soil quality;
- Coordination of the relevant Policies and Programs of the Government of Canada;
- Renewable resources, including migratory birds and other non-domestic flora and fauna;
- Meteorology; and
- Enforcement of Regulations



# Relevant Acts and Regulations

- *Department of the Environment Act*
- *Canadian Environmental Protection Act*
- *Fisheries Act – Pollution Prevention Provisions*
- *Migratory Birds Convention Act*
- *Species at Risk Act*



# ECCC-TRC-01: Dust Related Impacts to Water Quality

- ECCC recommends the Proponent:
  - Discuss the direction dust from the dry stack would be expected to disperse, including predictions for dispersion distance from the facility;
  - Discuss planned measures to mitigate and monitor for dust and snowpack deposition related impacts on water bodies from the dry stack tailings. This should be outlined in an existing monitoring and management plan or a new plan prior to transition to dry stack; and
  - Discuss planned monitoring in advance of implementation of the dry stack configuration to characterize existing dust/snow conditions in the absence of the dry stack tailings facility.



# ECCC-TRC-02: Aquatic Effects Monitoring Program (AEMP) Monitoring Stations

- ECCC recommends the Proponent provide additional analysis and discussion on the following:
  - Whether the reasons for monitoring and monitoring triggers in Table 3.1-1 will change with the Operational Update and update the table accordingly;
  - Discuss whether expanded more comprehensive monitoring is required in Windy and Imniagut Lakes; and
  - Provide rationale for whether existing monitoring stations in Windy Lake and Patch Lake are in suitable locations to detect indirect changes due to proximity to mine infrastructure.



# ECCC-TRC-03: Aquatic Effects Management Plan Benchmarks – Federal Environmental Quality Guidelines and Canadian Council of Ministers for the Environment Guidelines Update

- ECCC recommends that the Proponent provide a review of the updated and new guidelines (FEQG and CCME) for inclusion in the AEMP and confirm whether they will be adopted as new or updated water quality benchmarks. Where the updated guidelines are not adopted, technical supporting rationale should be provided.



# ECCC-TRC-04: Sewage Discharge – tundra vs Tailings Impoundment Areas (TIA)

- ECCC recommends the Proponent provide:
  - A discussion of the necessity to discharge sewage to the tundra or whether all sewage effluent could be combined with other wastewater streams and directed to the TIA;
  - Discuss whether other similar projects utilize sewage effluent discharge to the tundra;
  - Predicted volumes of sewage effluent discharged to the tundra under maximum camp capacity compared to recent discharge volumes and current maximum camp size volumes (400 people); and
  - An evaluation of whether existing monitoring in Doris Lake is appropriate to monitor for effects from the sewage effluent discharge, given the increased volumes of the sewage effluent.



# ECCC-TRC-05: Updates to Water Licence and Water Management Locations and Monitoring

- ECCC recommends that:
  - Changes in the marked-up update to the Licence (including but not limited to Tables 2 and 3) are accompanied by clear rationale describing the basis for the changes; and
  - The Proponent provide a figure that depicts any new proposed monitoring stations in relation to relevant infrastructure (e.g. waste rock piles, ore storage, etc.) to facilitate understanding of water management and monitoring.



# ECCC-TRC-06: Clarity for Burning at the Boston Site

ECCC recommends that the Proponent delete the sentence “Instead, there is a burn pan for combustible materials.” from Section D1.2 Incinerator Management at Boston of the document Hope Bay Operational Update Appendix 6-H: Incinerator and Composter Waste Management Plan to be consistent with Agnico Eagle’s response to ECCC-IR-03.



# ECCC-TRC-07: Emergency Response and Crisis Management Plan

ECCC recommends that the Proponent verify that the text describing a level two incident is accurate and update if necessary.



# ECCC-TRC-08: Spill Contingency Plan

ECCC recommends that the Proponent update the citation for the Emergency Response Guidebook to the 2024 version in the next version of the Spill Contingency Plan.



# ECCC-TRC-09: Hazardous Waste Management Plan

- ECCC recommends that:
  - Waste substances with a higher risk of leaks or spills be stored with secondary containment
  - For waste streams that encompass both higher risk (e.g., liquids) and lower risk (e.g., solids or substances with residual contamination) wastes, specify which storage method would be used for which type of waste.
  - Where landfarming is not effective to achieve discharge criteria, ECCC recommends exploring alternative methods of remediation for contaminated soil, gravel, and rock, before backfilling these materials underground.



# ECCC-TRC-10: Hydrocarbon Contaminated Materials Plan

ECCC recommends that the Contaminated Material Management Plan include, as appropriate, alternative methods of remediating contaminated materials.



# Thank You



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# Annex I: Current Status of Environment and Climate Change Canada's Technical Review Comments

ECCC-TRC-01	Dust-Related Impacts to Water Quality	Unresolved
ECCC-TRC-02	Aquatic Effects Monitoring Program (AEMP) Monitoring Stations	Unresolved
ECCC-TRC-03	AEMP Benchmarks – Federal Environmental Quality Guidelines and Canadian Council of Ministers for the Environment Guidelines Updates	Unresolved
ECCC-TRC-04	Sewage Discharge – Tundra vs. Tailings Impoundment Area (TIA)	Unresolved
ECCC-TRC-05	Updates to Water Licence and Water Management Locations and Monitoring	Unresolved
ECCC-TRC-06	Clarity for burning at the Boston site	Unresolved
ECCC-TRC-07	Emergency Response and Crisis Management Plan	Unresolved
ECCC-TRC-08	Spill contingency plan	Unresolved
ECCC-TRC-09	Hazardous Waste Management Plan	Unresolved
ECCC-TRC-10	Hydrocarbon Contaminated Material Management Plan	Unresolved

