



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2AM-DOH1335
Our file - Notre référence
GCDocs#133209383

February 7, 2025

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of Agnico Eagle Mines Ltd. January 2025 Revised Non-Hazardous Waste Management Plan for the Doris North Property Type A Water License: 2AM-DOH1335.

Dear Richard,

Thank you for the January 22, 2025, invitation to review the Revised Non-Hazardous Waste Management Plan for the Doris North Property, submitted by Agnico Eagle Mines Ltd. for Type A Water Licence No. 2AM-DOH1335.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-4550 or Andrew.Keim@canada.ca

Sincerely,

Andrew Keim

Andrew Keim
Manager
Water Resources, Nunavut Regional Office
Crown-Indigenous Relations and Northern Affairs Canada



Technical Review Memorandum

Date: February 7, 2025

To: Robert Hunter, Licensing Administrator, Nunavut Water Board

From: Andrew Keim, Manager – Waters

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of Agnico Eagle Mines Ltd. January 2025 Revised Non-Hazardous Waste Management Plan for the Doris North Property Type A Water License: 2AM-DOH1335.

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Hope Bay Project, operated by Agnico Eagle Mines Limited (Agnico Eagle), is located in the Kitikmeot region of Nunavut, Canada. The project encompasses three primary development areas: Doris, Madrid, and Boston. The project is regulated under several water licenses, with Water Licence 2AM-DOH1335 being central to the current Revision to the Non-hazardous Waste Management Plan as per Part F. Item 8 of Agnico Eagle Mines Limited's type A Water Licence. This licence governs the management of water resources and waste disposal associated with mining activities at the Hope Bay project.

In 2022, the Doris and Madrid mining operations were placed into Care and Maintenance, temporarily suspending ore extraction and milling activities. This transition led to Agnico Eagle reviewing and adapting water management and infrastructure on site to ensure continued compliance with regulatory standards and prepare to resume operations. During this period, a number of infrastructure projects have been moved forward including but not limited to:

- Modification of the Naartok Portal;
- Construction of an interim dike at the Tailings Impoundment Area (TIA);
- Construction and expansion of the Doris Airstrip;
- Updates to the Doris North Vent raise and diversion of surface flow;
- A Ridged fuel line access road expansion;
- A recent application for the new construction of two saline water storage ponds within the existing disturbed areas of Quarry D and Quarry 3;
- Application for the relocation of the Madrid Portal including pads and buildings to a new location.



Additionally, in compliance with the License and the submitted Care and Maintenance Plan CIRNAC notes that during this same period there have been a number of revised plans submitted for review and comment by Agnico Eagle including:

- Hope Bay Project Emergency Response Plan: Revised to reflect Hope Bay's 2022 exploration focus and alignment with look and feel of Nunavut division sites;
- Hope Bay Project Spill Contingency Plan: Revised to reflect the decision made by Agnico Eagle Mines Limited to place Doris Mill into Care and Maintenance, Section 1.5.1 details activities to be implemented during Care and Maintenance;
- Hope Bay Project Doris-Madrid Water Management Plan;
- Hope Bay Project, Phase2 Doris Tailings Impoundment Area – Operations, Maintenance, and Surveillance Manual;
- Hope Bay Project Explosives Management Plan: The plan was revised to incorporate activities implemented by Agnico Eagle Mines Limited through Care and Maintenance.

The current review is for a plan to ensure best practices with regard to the collection, handling, segregation, storage, transport and disposal of nonhazardous wastes throughout the Project. The plan has been submitted to ensure compliance with the license.

CIRNAC provides the following comments and recommendations with respect to the proposed plan. Table 1 summarizes the recommendations. Documents reviewed as part of this submission are in Table 2 of Section B. Detailed technical review comments are in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject
R1	Title of Submitted Plan
R2	Disposal Methods
R-3	Transportation of Waste Materials Between Sites

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
Non-Hazardous Waste Management Plan	Agnico Eagle Mines Ltd. Rev 2 Jan 2025



Document Title	Author, File No., Rev., Date
2AM-DOH1335 Care and Maintenance Plan	Agnico Eagle Mines Ltd. Rev 0 April 2022
2AM-DOH1335 Amendment No.3	Nunavut Water Board

C. RESULTS OF REVIEW

1. Title of Submitted Plan

Comment:

The Plan submitted to the Nunavut Water Board and distributed to Regulators comes up when opened with a title of the Shipping Management Plan as opposed to the Non-Hazardous Waste Management Plan.

Recommendation:

(R-01) CIRNAC recommends that the applicant confirm that the Plan as submitted is the final and most up to date plan to be reviewed.

2. Disposal Methods

Comment:

Agnico Eagle's submission of the Non-Hazardous Waste Management Plans contains Table 4.1 that details the waste materials to be covered by the Plan, the Handling methods to be employed on the ground by staff, the storage or interim storage location before final disposition and then the appropriate disposal method as proposed.

In a number of cases there are options provided that include either the opportunity to dispose of a waste in the non-hazardous Land fill on site or the waste may be transported off site to a licensed disposal facility.

CIRNAC is concerned that the criteria for choosing either option is not defined in the matrix and therefore it is open to interpretation and/or misunderstanding by staff on site leading issues during inspection or remediation of the site.

Recommendation:

(R-02) CIRNAC recommends that Agnico Eagle provide justification for when items will be placed in the non-hazardous land fill and the methodology to be used when determining what items will be transported off site to a licensed facility.



3. Transportation of Waste Materials Between Sites

Comment:

With respect to water licenses (2AM-DOH1335 B.9, 2BB-MAE172 E.20,) both contain the following clause;

“The Licensee shall dispose of and contain all non-combustible, non-hazardous solid wastes at the appropriate Doris North landfill or as otherwise approved by the Board in writing.”

CIRNAC supports this centralized approach but asks the proponent how are wastes that are generated at off site locations sorted and then transferred to the Doris sorting facility for deposition into sea cans or eventually into the Non-Hazardous landfill. What processes are available or being used at Madrid to ensure wastes are transported safely in accordance with the license or other applicable regulations?

Recommendation:

(R-03) CIRNAC recommends that the proponent provide more details related to the transportation of wastes both hazardous and non hazardous on site and how wastes produced off the Doris property make their way to the Sorting facility for packaging and disposal.