



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-DOH1335
Our file - Notre référence
GCDocs# 134188920

March 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 Response to Reply to Comments on the Review of the Licence Revised Non-Hazardous Waste Management Plan for the Hope Bay Project, Type A Water Licence No. 2AM-DOH1335

Dear Robert,

Thank you for the March 5, 2025 invitation to review the referenced licence review of the revised non-hazardous waste management plan application, submitted by Agnico Eagle Mines Limited (Angico), 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.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator



Technical Review Memorandum

Table 1: Summary of Recommendations

Recommendation Number	Subject	Status
R1	Title of Submitted Plan	Resolved
R2	Disposal Methods	Not resolved
R3	Transportation of Waste Materials Between Sites	Resolved

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
250305 2AM-DOH1335 Revised Non-hazardous Waste Management Plan - AEM response to comments-ILAE	Agnico Eagle Mines Limited, March 5, 2025



C. RESULTS OF REVIEW

2. Topic/Subject/Title

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.

Agnico's Reply to Recommendation:

Only non-salvageable waste will be placed in the landfill. Landfills on site are a normal approved facility for construction, operations and closure.

CIRNAC's Response to Reply:

Restates the recommendation and further, for clarity, Non-Salvageable waste is not a defined term. CIRNAC simply seeks clarity of process and would ask that be provided.

CIRNAC has no additional recommendations to the board.