



April 25, 2025

Email: jennifer.range@agnicoeagle.com

RE: Water Licence No: 2AM-DOH1335 – Non-Hazardous Waste Management Plan

On January 22, 2025, the Nunavut Water Board (NWB or the Board) received the revised Non-Hazardous Waste Management Plan, ver. 2 dated January 2025, for the Doris – Madrid Project as per Part F, Item 8.

Part F, Item 8 of the Licence requires the Licensee to submit a revised Non-hazardous Waste Management Plan for Board approval, at least six (6) months prior to construction of the landfill. This revised plan needs to include details addressing the comments made by intervening parties throughout the regulatory process for the Water Licence No: 2AM-DOH1335.

In the cover letter, Agnico Eagle have stated that the final landfill location was selected to be at Quarry 2 instead of the initially proposed Quarry 3. This decision was made to centralize waste management on-site and enhance operational efficiency. Other waste management facilities, including the incinerator and composter, are also situated at Quarry 2. Further, the Licensee also stated that *“The Inuit Elders Advisory Committee (IEAC) reviewed this decision in July 2024, with no concerns raised about the final landfill location.”*

On January 22, 2025, the NWB distributed the plan for public review. Interested parties were invited to submit their recommendations by February 24, 2025. The NWB received submissions from the Kitikmeot Inuit Association (KIA), Crown-Indigenous Relations and Northern Affairs (CIRNA), Environment and Climate Change Canada (ECCC) and Fisheries and Oceans Canada (DFO).

In their submissions, KIA and ECCC stated that they had no comments or concerns at this time.

Agnico Eagle responded on March 5, 2025. On March 5, 2025, DFO advised the Board that their concern was addressed by Agnico Eagle's response.

CIRNA provided follow-up requests on March 7, 2025. Agnico Eagle responded on March 26, 2025. On April 1, 2025, CIRNA stated that their concerns were addressed by Agnico Eagle's responses.

Following is a summary of the comments/questions and Licensee's responses.

Crown-Indigenous Relations and Northern Affairs (CIRNA)

1. CIRNA recommended that the applicant confirm that the Plan as submitted is the final and most up to date plan to be reviewed.

Agnico Eagle's response: Agnico Eagle stated that there was an error in the PDF document, which has been corrected, and confirmed that the Plan submitted is the final and most up-to-date plan.

2. CIRNA recommended that AEM justify what items will be disposed in the non-hazardous landfill and explain how decisions are made regarding off-site transport to licensed facilities.

Agnico Eagle's response: *"Only non-salvageable waste will be placed in the landfill. Landfills on site are a normal approved facility for construction, operations and closure".*

CIRNA follow-up: CIRNA requested a definition for "non-salvageable" waste and the process in its determination.

Agnico Eagle's response: Agnico Eagle stated that *"Economically non-salvageable is defined as non-hazardous, non-putrescible solid wastes from the construction, operation, and closure of the Hope Bay Mine that has negative monetary value when shipped South for recycling."*

Further, they mentioned that the criteria for determining its value would include:

- Demand for a particular recyclable material in the South, and
- Cost of material handling and shipping.

3. CIRNA recommended that the applicant provide more information on how both hazardous and non-hazardous wastes are transported on-site, including how off-site wastes reach the sorting facility for packaging and disposal.

Agnico Eagle's response: *"Non-hazardous wastes generated off the Doris property are segregated at the source in dedicated receptacles such as clear bags, refuse containers, barrels, plastic totes, roll off containers and shipping containers. This ensures non-hazardous waste streams are handled separately from hazardous waste streams (refer to Hazardous Waste Management Plan if additional details are needed). Packaged wastes are then transported to waste management facilities via light vehicle, fork truck, roll off truck,*

haul truck of container handler to be properly packaged and temporarily stored until the waste is disposed of in the appropriate manner.”

Fisheries and Oceans Canada (DFO)

1. DFO recommended that the Agnico Eagle provide a construction plan for the development of the landfill and provide a blast monitoring plan if any blasting will take place near fish bearing water.

Agnico Eagle’s response: Agnico Eagle stated that the landfill will be developed in a pre-developed quarry and there will be no blasting near fish bearing water.

Copies of all documents received in support of this submission can be accessed through the NWB’s Public Registry and FTP site using the following Link:

<https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-DOH1335%20AEM/3%20TECH/F%20WASTE%20DISP/F8%20Non-hazardous%20Waste%20Management%20Plan/>

The NWB has reviewed the revised Non-Hazardous Waste Management Plan ver. 2, dated January 2025, and finds the updated document functional and generally satisfying Water Licence requirements. By copy of this letter, the Board provides its approval through the Board **Motion No. 2025-A1-002**, dated April 25, 2025, as per Part F, Item 8 and Part B, Item 13 of the Water Licence.

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to licensing@nwb-oen.ca or by phone at (867) 360-6338.

Sincerely,

Lootie Toomasie
Nunavut Water Board, Chair

LT/as/rh

Cc: Distribution List – Doris North, Kitikmeot