Environmental Protection Operations Directorate Prairie & Northern Region 5019 52nd Street, 4th Floor P.O. Box 2310 Yellowknife, NT X1A 2P7

ECCC File: 6100 000 010/042 NWB File: 2AM-DOH1335



August 25, 2022

via email at: licensing@nwb-oen.ca

Richard Dwyer Manager of Licensing Nunavut Water Board P.O. Box 119 Gioa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 2AM-DOH1335 - Agnico Eagle Mines Ltd. - Hope Bay Project - Notice of Modification - Expansion of Airstrip at Doris

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Notice of Modification -Expansion of Airstrip at Doris submission.

ECCC is providing technical, science-based information and knowledge based on our mandate pursuant to the Canadian Environmental Protection Act and the pollution prevention provisions of the Fisheries Act. These comments are intended to inform the assessment of this project's potential effects in the receiving environment and on valued ecosystem components. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

1. Airstrip Construction Material

Reference(s)

Water License 2AM-DOH1335 – Notice of Modification – Expansion of Airstrip at Doris

Comment

Although engineering drawings are presented for the proposed expansion, the Proponent does not indicate the type of rock materials to be used for the expansion construction.





ECCC Recommendation(s)

ECCC recommends that potential acid generating (PAG) rocks are not used for the extension construction.

2. Accidents and Malfunctions

Reference(s)

 Drawing #DN-1Kft-AE-01, Water License 2AM-DOH1335 – Notice of Modification – Expansion of Airstrip at Doris

Comment

The Proponent illustrates the location of the Quarry 1 tank farm in the drawing, which is in close proximity with Roberts Bay. However, there is no information on the amount of fuel that will be stored in that area, as it could potentially trigger the *Environmental Emergency Regulation* under the *Canadian Environmental Protection Act* (CEPA), and would require an emergency response plan. Furthermore, no information was provided on the spill prevention measures that will be implemented to avoid a potential spill in Roberts Bay.

ECCC Recommendation(s)

ECCC requests that the Proponent provide information on:

- the type and total capacity of fuel that will be stored; and
- additional information on mitigation measures to reduce the effects of a spill or fire to the surrounding environment.

3. Accidents and Malfunctions

Reference(s)

 Drawing #DN-1Kft-AE-01, Water License 2AM-DOH1335 – Notice of Modification – Expansion of Airstrip at Doris

Comment

Refuelling activities are likely to increase due to more fuel required for the aircrafts. As a result, the risk of spills will increase due to overtopping or equipment failure. The Proponent has not provided any information on mitigation measures associated to the increased risk of accidental spills.

ECCC Recommendation(s)

ECCC encourages the Proponent to demonstrate how they have evaluated their project's environmental risks and what they have done to prepare for and mitigate spills or releases of hazardous or deleterious substances, are likely to result from unplanned accidents and malfunctions.

If you need more information, please contact Stephinie Mallon at Stephinie.Mallon@ec.gc.ca.

Sincerely,

[original signed by]

Stephinie Mallon Environmental Assessment Officer

cc: Jody Small, Acting Head, Environmental Assessment North (NT and NU)