

EXECUTIVE SUMMARY

Aboriginal Affairs and Northern Development Canada (AANDC or the Department) has participated in the ongoing review of the Lupin Mines Incorporated (the Licensee or LMI) application (the application) for the renewal and amendment of Type A water licence 2AM-LUP0914 (Type A licence or 2AM-LUP0914) for the Lupin Mine Project.

While some information has been provided to support the review of the application and some commitments have been made to provide information following licence issuance, more information is required from LMI prior to the issuance of a water licence. AANDC has reviewed the new information submitted by LMI and provides comments and recommendations in this submission for the Nunavut Water Board's (Board or NWB) consideration.

There remain a number of outstanding issues that pose a risk to water resources and should be considered if the mine is to be relicensed including: non-compliance with licence conditions and AANDC Inspector's requests; lack of monitoring and assessment of tailings cover effectiveness; characterization of windblown material outside of the tailings containment area; removal of hazardous waste from site, and the extent of contaminated soils and acid generating waste rock.

LMI has provided revisions to the reclamation cost estimate but has not addressed all the deficiencies identified in October 2014. The financial security currently held by the Minister is insufficient to cover the total outstanding reclamation liability of the mine site and a significant increase is recommended to ensure that Canada will not be held financially liable for the cost of reclamation should the mine be abandoned.

The information requested is necessary to assess environmental liability and to estimate reclamation costs. Additional information is required prior to licence renewal. Alternatively, the financial security required under this licence should take into account the remaining uncertainties and be adjusted accordingly.

ATANIUYUNUT NAINAQHIMAYUT

Nunaqaqaqtuligiyyikkut Ukiurtaqtumilu Pivaliayuligiyyit Kanatami (AANDC-kut tamnaluniit Timiuyut) ilauhimayut kayuhininut naunaiyaqnit taphuma Lupin Uyagakhiuqvit Nanminilgit (tamna Laisataqhimayuq tamnaluniit LMI-kut) tukhigautat (tamna tukhigaut) nutanguqnianut ihuaqgigiaqnianutlu tamna Qanugittunia A imaqmun Laisa 2AM-LUP0914 (Qanugittunia A laisa tamnaluniit 2AM-LUP0914) taphumunga Lupin Uyagakhiuqvik Havanguyuq.

Pititlugit ilia tuhagakhat piqaqtitaushmanit ikayuqhiqhugit tapkuat naunaiyaqni tapkuat tukhigautit ilailu atuqniaqniqaqnit piyautaqhimani tuhagakhat kinguagut laisauyuq tuniyauniani, tuhaqpaligakhat piyalgit tapkunanga LMI-kut hivuani tuniyauniahagtitlugit imaqmun laisakhamik. AANDC-kut naunaiyaqhimayai nutat tuhagakhat tuniyai tapkuat LMI-kut piqaqtittugitlu uqauhit atugahuaqunitlu uumani tuniyami tapkununga Nunavut Imaligiyyit Katimayit (Katimayit tamnaluniit NWB-kut) ihumagiqahiutiyakhai.

Huli piqaqtuq qaphinik iniqhimaittunik pityutunik hivuganagutauni imaqaqniuyunut ihumagiyauyukhatlu pikpat uyagakhiuqvik laisatatqikhaqqat ilautitlugit: malikhangitnit laisauyup atugiaqaqninut tapkuatlu AANDC-kut Qauyihaiyat tukhigaqnit; munaqhityutaitni qauyihagnilu uyagaktaqnikunut kuvigaqviani hauyauni atuttiagiangit; qanugittuyangit hiamaktaunit anuqimun hunat hilataani taphuma uyagaktaqnikut kuvigaqviata hiamaktailiviup; ahivaqni hivuganaqtut iqakut hannavikmin, qanuqtutlu halumaitnitlu nunat huguilatlu iqakut uyaqat.

LMI-kut piqaqtitiyut nutanguqtauninik halumaqtigiyut akitunit kihimik pihimaitai tamaita iniqhimaitnit naunaiqtaunit talvani Aktuupa 2014-mi. Tamna kiinauyaliqutinut nautiumatit tatya tigumiaqtai taphuma Minihitauyuq naamangittuq piyauninik tapkuat katitlugit pihimaitnit halumaqtiginiqmun atugait taphuma uyagakhiuqvik qimaktauniqat.

Tamna tuhagakhaq tukhigaunia piyalik naunaiyaqninut avatiliqutit atugait mikhauttaqnilu halumaqtiginiqmun akitunit. Tuhagumafaaktuhauyugut kanugiliuligiahaita angiktautinagu laisihak. Ahiaquttauq, tamna kiinauyaliqutit nautiumatit piyalgit malikhugu laisauyuq ihumagiqahiutiyakhat hippakuinut naunapyaknit ihuaqhigialugitlu taimaatut.