



Environmental Protection Operations Directorate
Prairie & Northern Region
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ECCC File: 6100 000 008/012
NWB File: 2AM-MEA1526

August 24, 2018

Via email at: licensing@nwb-oen.ca

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

Dear Mr. Dwyer:

**RE: 2AM-MEA1526 - Agnico Eagle Mines Ltd. - In-pit Tailings Disposal
Modification – Review of Proponent Responses to ECCC Technical Comments**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned in-pit tailings disposal modification and is submitting comments via email. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

ECCC is generally satisfied with the comment responses provided by Agnico Eagle Metals Ltd. (the Proponent or AEM) on August 17, 2018 to ECCC's August 3 Technical review comments; however, the time frame for the commitments should be clarified with respect to the predicted timing of closure.

The following timing for closure has been provided by AEM:

According to the Technical Memorandum on potential water treatment requirements (SNC-Lavalin, July 4, 2018) in-pit deposition activities are planned to end January 2022. However, the Water Balance and Water Quality Forecast (Sept. 12, 2017) Figure 3-1 shows deposition concluding after Dec. 2022, i.e. January 2023.

Submission of the Final Closure Plan is due 12 months before the end of mining, so the Final Closure Plan would be due January 2021 or 2022 (if there are no future ore bodies developed). AEM is planning for a 3 to 5 year treatment period based on reclaim water volume. The current licence expires in July of 2025. Thus the Final Closure Plan would be submitted and much of the water treatment done subject to this licence.

Subsequent work would be under the renewal "closure" licence, since plans are for the active closure of the Meadowbank Gold Project to occur from 2026 to 2029 (estimated), with pits being flooded (once treatment levels are reached).

ECCC recommends that based on the scheduled activities provided, the Proponent clarify the timing of deposition activities. ECCC also recommends that the commitments made by AEM be incorporated into the modification proposal so that the licence conditions are explicit regarding timing of closure activities with respect to water quality.

The following specific comments are provided on the Proponent's response to ECCC's technical review comments:

- 1) ECCC #1. AEM has agreed to plan for stability of treatment residuals for treatment outside of the pit as recommended by ECCC. Treatment would be introduced at the end of tailings deposition, and AEM states that the final treatment plant details will be included in the Final Closure Plan (due 12 months prior to end of mining). At that time there will be additional data to inform planning, which would satisfy this recommendation by ECCC.
- 2) ECCC #2. ECCC had identified concerns with management and treatment of high-sulphate and total dissolved solids (TDS) wastewater, and recommended further work be done by AEM well in advance of closure planning and prior to re-flooding. AEM has agreed to this, and ECCC is satisfied this can be addressed in the regulatory process prior to submission of the Final Closure Plan.
- 3) ECCC #3. AEM has agreed that they will evaluate the feasibility of capping the tailings, and identify conditions where this may be warranted. In addition, AEM has agreed to monitor pore water quality and identify potential mitigation strategies, if needed. This is anticipated to be done in the period leading up to development of the Final Closure Plan, which would satisfy this recommendation by ECCC. However, timing should be identified for the monitoring and identification of mitigation strategies.

Should you require further information, please do not hesitate to contact Melissa Pinto at (867) 669-4733 or Melissa.Pinto@canada.ca.

Sincerely,



Susanne Forbrich
Regional Director

cc: Georgina Williston, Head, Environmental Assessment North (NT and NU)