

Environmental Protection Branch Qimugjuk Building 969 P.O. Box 1870 Iqaluit, NU X0A 0H0

Tel: (867) 975-4639 Fax: (867) 975-4645

August 27, 2003 Our file: 4703 001 015

Stephanie Briscoe Executive Director Nunavut Impact Review Board P.O. Box 2379 Cambridge Bay, NU X0B 0C0

Cambridge Bay, NU X0B 0C0 Tel: (867) 983-2593

RE: Cumberland Resources Ltd. - Meadowbank Project Screening Comments

Environment Canada (EC) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to comment on their letter dated July 29, 2003 regarding the screening of the Cumberland Resources Ltd., Meadowbank Project. In this letter, the NIRB has requested that the regulators provide comments regarding the screening of the project under Section 12.4.4 of the Nunavut Land Claim Agreement (NLCA), and assess the project description and supporting applications for potential effects on the ecosystemic and socio-economic environments. Environment Canada offers the following comments to the NIRB to assist in their decision-making process.

After reviewing the project description and supporting documents, EC is of the opinion that there is potential for this project to cause adverse environmental impacts. This large gold mine project includes a proposal for a series of three extensive open pits and involves the construction of water retention dykes to allow for open pit mining beneath shallow lakes. This will cause terrain, and lake bed disturbance and could impact the permafrost regime. Underground mining will also be conducted in two of the three pits. Given the volume of waste rock that will be created, there is a potential for acid rock drainage to occur. The mill is projected to produce 4,700 t/d of ore and utilizes a cyanide leachate method for gold recovery, from which the resulting waste stream could have potential impacts on lake and downstream water quality. Additionally, the mine would require the construction of access infrastructure including: a 92 km winter haulage road; a 7 km, two-lane all season haul road between the main deposits and the process plant; and a 1,650 m long airstrip. Given the **potential** for these activities to produce significant environmental impacts, it is Environment Canada's opinion that a review under Section 12.4.4(b) of the NLCA would be appropriate.

As a result of this recommendation, EC will not be providing any comments to the NIRB in regards to the potential effects of the project on the ecosystemic and socio-economic environments at this stage of the review process. If the NIRB is in agreement with EC's recommendation, a thorough technical review of the project will be completed once an Environmental Impact Statement is submitted. We look forward to working with the NIRB throughout this review process, and thank you for your consideration of our comments.

If you have any questions or comments with regards to the foregoing please do not hesitate to contact me at (867) 975-4639 or by email at colette.meloche@ec.gc.ca.

Yours truly, Colette Meloche **Environmental Assessment Specialist**

(Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife) CC:

(Warren Fenton, Manager, Environmental Assessment, Departmental Affairs Branch, Edmonton)

(Diane Campbell, Director, Environmental Assessment, Environment Canada, Ottawa) (Glen Stephens, Manager, Contaminants, Indian and Northern Affairs Canada, Igaluit)

(Michelle McChristie, Manager, Water Resources, Indian and Northern Affairs Canada, Iqaluit)

(Carl McLean, Manager, Lands, Indian and Northern Affairs Canada, Iqaluit)

(John Ramsey, Natural Resources Canada, Ottawa)
(Barry Putt, Canadian Coast Guard/Navigatable Waters, Sarnia)

(Carolyn Dunn, Health Canada, Ottawa)
(Doug Soloway, Transport Canada)
(Debra Myles, Canadian Environmental Assessment Agency, Ottawa)