



Nunavut Regional Office
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Your file - Votre référence
03-MN-107
Our file - Notre référence
IQA-N 5510-5-3 UNC

September 5, 2003

Stephanie Briscoe
Executive Director
Nunavut Impact Review Board
PO Box 2379
Cambridge Bay, NU XOE OCO

Dear Ms. Briscoe,

RE: Comments on screening of Meadowbank proposal

Thank you for your letter of July 29, 2003, in which you asked interested parties to a) assess concerns regarding the Meadowbank project and b) indicate a preferred course of action under Section 12.4.4 of the Nunavut Land Claims Agreement. We have reviewed the document "Meadowbank Gold Property Project Description and Report", dated March 2003, and the supporting applications, and offer the following comments.

In terms of the Meadowbank project, the role of Indian and Northern Affairs Canada (INAC) in this impact assessment is as follows:

- ministerial responsibilities and approval of the water licence
- administration of the subsurface mineral leases on the North Portage, Third Portage, and Goose Island deposits. These leases are on Inuit Owned Land but are administered by INAC as per Article 21.7.2 of the NLCA (Grandfathered Claims).

Throughout the impact assessment process, INAC can offer specialized expertise in:

- a. geotechnical and permafrost engineering;
- b. acid rock drainage and mitigation;
- c. geochemistry;
- d. surface and ground water quality and quantity;
- e. hydrogeology;
- f. hazardous material handling and storage;
- g. wastewater treatment; and
- h. closure and reclamation planning and security.

Overall, we felt that the document is well-organized and well written. We appreciated the effort and the attention that the proponent has already directed toward the environmental assessment process, including collecting baseline information and consulting with the community of Baker

Lake. Our assessment, however, has identified the following concerns which we feel merit further impact assessment, based on the potential for adverse effects:

- the potential for acid rock drainage (ARD), and subsequently the effectiveness of ARD containment and mitigation, including the oxidation and potential ARD occurring on exposed open pit mines surfaces;
- the effect of extreme stresses, such as weather events, on the containment systems and the incorporation of contingency planning into the structural designs;
- anticipated changes in the thermal status of the lakes through the addition of tailings to the specified water bodies, and the subsequent impact on frozen ground and planned containment structures; and
- alternatives analysis for site infrastructure, for instance open pit mining, the route of the proposed Vault Haul Road, tailings and waste water containment and treatment.

INAC is of the opinion that the Nunavut Impact Review Board should choose alternative b) of Section 12.4.4 of the NLCA: the proposal requires review under Part 5 or Part 6. In addition to the potential adverse effects noted above, our reasons for this recommendation are that Cumberland Resources Ltd. has identified a number of studies that are still forthcoming that will require detailed assessment. We also feel a more thorough alternatives analysis is required, as well as details on the proposed environmental management system.

We look forward to working with you, the proponents, and the affected communities throughout the impact assessment of the Meadowbank project. Feel free to contact me at 867-975-4549, or Janice Traynor at 867-975-4554, at any time.

Sincerely,

original signed by

Glen Stephens
Manager, Environment

cc. John Ramsey, Natural Resources Canada
Debra Myles, Canadian Environmental Assessment Agency
Ed McLean, Parks Canada
Colette Meloche, Environment Canada
Carolyn Dunn, Health Canada
Doug Soloway, Transport Canada
Stephanie Critch, DFO