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Department of Environment

Ministère de l'Environnement

November 2, 2007

Richard Dwyer  
Licence Administrator  
Nunavut Water Board

**Via email to:** [licensingadmin@nunavutwaterboard.org](mailto:licensingadmin@nunavutwaterboard.org)

**RE: NWB FILE # 2AM-MEA – AGNICO-EAGLE MINES LTD. – CONFORMITY  
ASSESSMENT ON MEADOWBANK WATER LICENSE APPLICATION**

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) thanks the Nunavut Water Board (NWB) for the opportunity to comment on the completeness of the Agnico-Eagle Mines Ltd. (applicant) Type A water license application regarding the Meadowbank gold mine project. DOE has conducted a general review of the application for conformity with the *Nunavut Water Board Preliminary Guidelines for Applicant* dated March 14, 2007, and the Nunavut Impact Review Board (NIRB) project certificate (NIRB PC No. 004) terms and conditions.

DOE has concluded that the application generally satisfies the requirements of the guidelines. It is important to note however, that given the time period and the volume of information, DOE was not able to undertake a technical evaluation on the adequacy of the material, but merely indicates whether the applicant has attempted to address all the issues identified by NWB in the guidelines.

For our detailed comments, please refer to the document attached; however, these comments can be summarized as follows.

**Organization and Formatting of the Application**

DOE believes that the information in this license application is poorly organized; making it difficult to locate material related to issues of concern. For example, links between the main document (*Meadowbank Gold Project Type A Water License Application*), and its supporting documents, as well as links between the supporting documents are weak. Additionally, many supporting documents do not have a table of contents, this adds to the difficulty in locating information. The applicant should also ensure all documents referenced in the main and supporting documents are provided for review.

Finally, for ease of reviewing, once the application is approved to move forward to the technical review stage, DOE would appreciate receiving hard copies of the application and its supporting materials.

### Management, Mitigation and Monitoring

Information related to management and monitoring of some project components has not been provided, this includes the following:

- Engineering design and drawings for the all-weather road, airstrip, landfarm, tankfarm and landfill;
- Monitoring plans for the Baker Lake marshalling facility, all-weather road and quarries;
- Information related to blasting in the context of Ammonium Nitrate run-off is deficient in details. It is important that the applicant provides a detailed plan including, identifying and quantifying potential pathways to the environment, along with mitigation measures and adaptive management procedures should management measures malfunction.

### Spill Contingency Planning

Spill contingency planning related to all-weather road and marine components has not been discussed in the spill contingency plan. Furthermore, the applicant indicated in the application that they will ensure contractors employed on this project will comply with company policies; however no details on how this will be achieved have been provided for review.

### Annual Reporting

The applicant indicates in their application that annual reporting related to this water license will be carried out. However, it is not clear in the application whether the annual report will include the following:

- A Comparison between water quality objectives, baseline/control sites, and monitoring results, in the context of water quality in receiving environment;
- Compliance with the terms and conditions of the NIRB project certificate for this Meadowbank project;
- Any future project changes and adaptive management associated with the changes;
- Any action taken to resolve issues from water license inspections.

## DOE Regulations and Guidelines

DOE has a series of relevant regulations and guidelines under the *Environmental Protection Act* (which can be obtained on request) for ensuring that environmentally acceptable management procedures, emission levels and disposal methods are maintained. Some of these are included within the application, but not all. For the information of the applicant, and to ensure their inclusion in the final document, a list of all the relevant DOE regulations, guidelines and policies is provided.

- *Spill Contingency Planning and Reporting Regulations*
- *Guideline for Dust Suppression*
- *Guideline for the General Management of Hazardous Waste in Nunavut*
- *Guideline for Industrial Waste Discharges in Nunavut*
- *Guideline for Contaminated Site Remediation*
- *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*
- *Guideline for the Management of Waste Antifreeze*
- *Guideline for the Management of Waste Asbestos*
- *Guideline for the Management of Waste Batteries*
- *Guideline for the Management of Waste Paint*
- *Guideline for the Management of Waste Solvents*
- *Guideline for the Management of Waste Lead and Lead Paint*
- *Disposal Guidelines for Fluorescent Lamp Tubes*

Additionally, the Government of Nunavut is signatory to the *1998 Canada Wide Accord on Environmental Harmonization* and the *Canada-wide Environmental Standards sub-agreement*, to provide for the continual development, improvement, and attainment of priority Canada-wide Standards (CWS's) for environmental quality and human health across Canada, consistent with the vision and principles of the Accord. The following CWS's are relevant to this project:

- *Canada-Wide Standards for Dioxins and Furans*
- *Canada-Wide Standards for Mercury Emissions*
- *Canada-Wide Standards for Petroleum Hydrocarbons (PHC) in Soil*

Once again DOE thanks NWB for the opportunity to comment on Agnico-Eagle Mines Ltd. water license application.

Yours sincerely,

### ***Original signed by***

Helen Yeh  
Coordinator, Environmental Assessment  
Department of Environment  
Government of Nunavut

**Attachment:** Excel Document titled: *type "A" Water Licence Application Conformity Assessment Meadowbank Project - Nunavut*