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Avatiliqiyikkut

Department of Environment

Ministère de l'Environnement

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RE: Preliminary draft guidelines for Meadowbank Water License

Dear Phyllis,

The Government of Nunavut Department of Environment (DOE) thanks NWB for providing us with the draft Preliminary guidelines for preparation of the Meadowbank water license for our review. DOE has the following comments:

Reference: Page 4. Final paragraph

The text asks the proponent to recognize that the NWB process is independent of NIRB's environmental assessment process. This statement is contradictory to the fifth paragraph on page 8 that requires the proponent to submit a '*NIRB Project Certificate conformity Table*'. DOE recommends that the guidelines consistently define the integrated nature of the NIRB and NWB processes. References to Nunavut Land Claims Agreement, Articles 12.9.1- 12.9.3 will clarify these linkages and therefore the need for the water license to address intervenor issues raised during the NIRB process that resulted in eventual development of NIRB Project Certificate Terms and conditions.

Reference: Page 4, final paragraph.

The proponent is advised by the guidelines to cross-reference information submitted during the NIRB review of the project; yet later in the third paragraph of page 5, the guidelines ask that management and design correspondence be discrete and standalone. DOE finds these statements contradictory and confusing. We are also concerned that the former statement assumes all those participating in the water license review are in possession of, and familiar with, all the NIRB documentation. While this may be true for government departments; this license review is a public process and those wishing to participate may be restricted by lack of access to the documents submitted in a separate review. DOE recommends that the guidelines clearly require submission of a complete standalone application.

Reference: Section 3.0, Additional Documents to assist the proponent.

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Please remove the reference *GNWT- Spill Contingency and Reporting Regulations*. The mirror GN regulations are already included.

Section 3 provides a comprehensive list of reference documents related to construction, operation, management, mitigation and monitoring and closure of Meadowbank mine. However, DOE is aware that parts of the Meadowbank project are located within the municipality, most notably the marshalling area. DOE is unsure as to the scope of the current license application and whether this includes the marshalling area; however, during the NIRB review DOE made frequent reference to the need to maintain and monitor water quality standards in the lake itself. The lake provides drinking water for the community and as such the *Guidelines for Canadian Drinking Water quality* should be included as guidance for the proponent.

Additionally, during the NIRB reviews the proponent committed to become a signatory of the *International Cyanide Management Code*, this document should inform project design and management and be included in the list.

Further documents for inclusion depending on the scope of the review could include the GN-*Wildlife Act* and the *Canada-Wide Standards for Dioxins and Furans*, and the *Canada-Wide Standards for Mercury Emissions*.

Review of Annex A

It is understood by DOE that a Table of Contents (Annex A) will be developed and attached to these guidelines following a meeting with the proponent. This table will provide further guidance to the proponent on the expected content of their water license. DOE therefore reserves the right to provide further comment on these guidelines once we have had the opportunity to review the completed document including Annex A.

DOE thanks NWB for the opportunity to provide feedback on the Draft guidelines. We hope our comments will be of assistance.

Yours sincerely

Mike Atkinson
Manager Environmental Assessment and Land Use