



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
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Your file - Votre référence
2AM-MEA1526
Our file - Notre référence
CIDM#1259638

August 23, 2019

Mr. Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's comments on
2AM-MEA1526 Waste Rock and Tailings Management Report & Plan July
2019**

Dear Mr. Dwyer,

Thank you for your July 26, 2019 invitation to comment on the above-referenced management plan.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the in-pit tailings disposal of the Waste Rock and Tailings Management Report & Plan pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*.

In this updated management plan, Table 6.5 indicates that no tailings would be deposited into the Tailings Storage Facility (TSF) after July 2019. CIRNAC would request that AEM clarify its plans for the TSF and provide a progressive closure plan if the TSF will no longer to be used for tailings disposal.

In addition, Section 9.2 states "*The closure strategy for in-pit consists of pit flooding and dike breaching once the water quality is met.*" CIRNAC notes that water in the pit may potentially fail to meet the quality criteria after pit flooding and requests AEM to provide its closure strategy or contingency plans for such scenarios.



Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

CIRNAC appreciates the opportunity to participate in this review. If there is any question, please contact me at (867) 975-4555 or david.zhong@canada.ca.

Sincerely,

David Zhong
Regulatory and Science Advisor