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Via E-mail : licensingadmin@nunavutwaterboard.org

Richard Dwyer
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Mr. Dwyer:

Subject: Updated Water Management Plan and Mine Waste Management Plan

Fisheries and Oceans Canada (DFO) would like to thank the Nunavut Water Board for the opportunity to review the above mentioned Plans. DFO provides the following comments.

It is mentioned that there are some updates to Plans, but it is difficult to identify where the changes are noted. A separate summary section should be provided in Updated Plans to highlight the changes.

Updated Water Management Plan:

A number of contingency options related to TSS Management are presented on page 3-25 but all are deemed to be not feasible or preferred. The Management Plan should be describing what management actions will occur should there be TSS issues.

In "Section 3.3 Dike Breaching" (page 3-30) concern is identified that metals in fine clays and silts are likely to be mobilized during re-flooding of the pit areas. Although it is stated that these materials will settle in time, this disturbance could result in impacts to biota for a significant time period. In addition, some of the additional terrestrial areas could also release mercury when flooded. It is recommended that some of these materials should be tested for metals before re-flooding to determine if they should be removed.

It is suggested in "Section 4.5.2, Water Management Systems and Activities" on page 4-8 that Phaser Lake could be used as an attenuation pond for pit water and rock storage runoff. DFO has expressed concerns that the diversion of non-contact water should not impact water levels in Phaser Lake so that overwintering habitat for fish is not impacted by the project. Lake levels will therefore have to be monitored. Additionally, the use of

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Phaser Lake as an attenuation pond and the resulting impact on fish and fish habitat has not been assessed.

Mine Waste Management Plan

An Adaptive Management Plan is mentioned in the Executive Summary (4th paragraph), page 1-2 and Section 7.3.1 page 7-3, however, it is difficult to determine whether this is in reference to a general strategy or Plan. All Plans should be referenced appropriately or developed for Board approval.

A number of control strategies for acid rock drainage are listed in Section 4, on pages 4-1 and 4-2. This section vaguely describes what strategies will take place at Meadowbank. More detail should be provided especially in regards to monitoring to ensure the strategies are effective.

Lake sediments (page 5-1, last paragraph) are proposed to be deposited between the North Portage deposit and the East Dike to potentially be used for reclamation material. What is the fate of these materials should they not be used for reclamation? Their placement near high value fish habitat is a concern.

Should you have questions, or require clarification please do not hesitate to contact me at (519) 668-2132.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dave Balint', with a stylized, cursive script.

Dave Balint
Senior Habitat Biologist
Fisheries and Oceans Canada
Eastern Arctic Area

copy Eric Kan, Fisheries and Oceans Canada
Jane Tymoshuk, Fisheries and Oceans Canada