NIRB File No. 11MN034: NIRB Response to Comments Submitted Regarding *Draft* EIS Guidelines – December 15, 2011

Comments on the Revised Draft EIS Guidelines Document

Section	Commenter	Comment	Action	Justification
General Comments	AANDC	That the DEIS include a table or list of what additional information, details, data, etc. that the Proponent expects to include in the FEIS. For each item listed, a reference to the appropriate guideline requirement should be provided as well as a rationale when information is not to be provided until the FEIS stage.		
	EC	Refer AEM to the recently released Guidelines of the Assessment of Alternatives for Mine Waste Disposal (Sept 2011)	edit made	edits made as per EC's recommendations
Table of Contents	AANDC	Update the table so sub-sections 6.6.3.1 to 6.6.3.6 is included	no edit made	
Acronyms	EC	PM2.5 - revise the definition as follows "particulate matter of 2.5 micrometers or less"	revision made	
2.5 Sustainable Development		Was the consideration of ecosystemic integrity outside the NSA was intentionally excluded from this sentence. If this area falls within NIRB's mandate, EC recommends ecosystemic integrity be added to this paragraph	no edit made	The quote is correct for section 12.2.5 of the NLCA.
3.1 NLCA – Sections 12.5.2 and 12.5.5	AEM	Change the Abandonment and Reclamation Plan (A&R Plan) to a Mine Closure and Reclamation Plan	changed where	The Board reworded abandonment where it could in the document (section 4.4); however, in section 3.1 the NLCA is directly quoted and we are unable to change that wording. It is the NIRB's understanding that abandonment in this case is referring to the relinquishing of the leased land after responsible reclamation to the KIA
4.2 Conformity	AANDC	Suggest that the Proponent should be instructed to explain and justify their reasoning for each omission identified, and include information about what will be provided in the FEIS vs. DEIS	edit made	further clarification of expectations in EIS
4.4 Format				The Board reworded abandonment where it could in the document (section 4.4); however, in section 3.1 the NLCA is directly quoted and we are unable to change that wording. It is the NIRB's understanding that abandonment in this case is referring to the relinquishing of the
	AEM	Change the Abandonment and Reclamation Plan (A&R Plan) to a Mine Closure and Reclamation Plan	edit made wording was	leased land after responsible reclamation to the KIA
	AEM	What is meant by a "fully functioning PDF format"	changed	added clarification
5.2 Regulatory Regime	AEM	The last paragraph of section 5.2 should be removed as this information is most likely to be confidential and will not be helpful in determining the impacts of the project	Removed	
6.1 Project Design				This has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such
	AEM	Oceanographic conditions - eliminate as it falls outside the scope of the project	no edit made	detail.
	EC	This list should include hydrogeology given the permafrost issues related to the North	edit made	clarification of ecosystemic components
6.4 Future Development	AEM	Cumulative impacts in the marine ecosystem - eliminate as it falls outside the scope of the project	no edit made	This has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	As the transportation of gold from the mine site is sensitive as it relates to security and thus should not be discussed in a document aimed at being publically debated. Therefore alternatives for the transportation of gold should not be discussed.	removed, included in 6.6.1.2	The Board acknowledges that the transportation of gold may be sensitive as it relates to security, however the Board would ask for AEM's assurance that no airstrip is being proposed at the site now or in the near future for this purpose and for a discussion of proposed options to transport the final gold product away from site.
	AANDC	Clarify the first bullet as it is not clear what kind of options are being requested if the 12.10.2 exception is not granted	edit made	clarification made to bullet
	AANDC	3rd bullet (access to all identified ore deposits) it is not clear whether the alternatives analysis refers to the	edit made	clarification made to requested points

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		road, the mine or mining methods such as the underground or open pit.		
		Consider including a bullet on metallurgical ore processing as well as the following changes: 7th and 8th		
		bullets add disposal and for the 9th bullet add site water treatment (i.e., any mill, sewage, tailings, storm		
	AANDC	water treatment, etc.)	edit made	clarification made
		In the first paragraph, AANDC recommends clarification in the text that the reasons provided by the		
		Proponent are to include consideration of environmental and social impacts and benefits and not only		
	AANDC	economic costs.	edit made	clarification made
		In the 3rd paragraph requires further clarification on the level of detail requested on how the proponent is		
	AANDC	to evaluate the cumulative effects for each alternative or what each alternative should be compared to.	edit made	clarification
		It is recommended that EC's guidelines for the assessment of alternatives for mine waste disposal be		
		referenced here. Potential wording could be "the proponent is encouraged to refer to EC's guidelines for		
		the Assessment of Alternatives for Mine Waste Disposal (Sept 2011) when assessing and presenting	10.	
	EC	alternatives for mine waste management, including tailings and waste rock storage options.	edit made	new materials to reference for this section recently released
6.6 Detailed Project Proposal				This has been included in the Guidelines issued for similar mining
Description		C Calculation and the control of the		proposals, and so NIRB expects AEM to address this within the EIS as
	A 5 A A	6.6 air shipping activities are regular activities already occurring in the community. The project would take		well as to provide justification where it is not able to provide such
	AEM	advantage of the existing air carrier services already being offered		detail.
		6.6 recommend that a section to describe ore processing should be included as part of the project		
	AANDC	description. It should include plant layout, provide and describe the flow sheet for ore processing,	adit mada	addad bullat
	AANDC NRCan	material flow and waste stream, energy consumption and water consumption.	edit made	added bullet
	NKCan	6.6.1.1 in the 9th bullet, it is suggested to add "acid neutralizing potential" to the list currently there	edit made	clarification of expectations
	EC	6.6.1.1 2nd last bullet recommend replacing "metal/metalloid content and acid generating potential with "acid rock drainage (ARD) and metal leaching (ML) potential	edit made	
	EC	6.6.1.2 recommend including the following in the second bullet, "including site layout, mine water	euit made	
		management, anticipated production rate, designed production capacity, production schedule, equipment		
	AANDC	selection, energy consumption and energy efficiency measures.	edit made	
	AANDC	6.6.1.2 3rd bullet recommend including implications of groundwater on nearby surface waters and vice	euit maue	
	EC	versa	edit made	
	EC	6.6.1.2 6th bullet suggest that "for run-off and" be added to the bullet	edit made	
	EC	6.6.1.3 2nd bullet - recommend that both short-term and long-term be included	edit made	
		6.6.1.3 3rd bullet - recommend replacing "acid-generation and metal leaching: with "ARD and ML	eartifiade	
	EC	potential"	edit made	
	EC	6.6.1.3 4th bullet - recommend replacing "acid generation" with "ARD/ML"	edit made	
		6.6.1.3 recommend inserting an additional bullet to include "description of run-off and seepage	caremade	
	EC	prevention/control structures"	edit made	
	AANDC	6.6.1.4 recommend including a bullet that describes any plans to recycle or re-use water resources	edit made	
	704120	olocal recommend including a bunch that describes any plans to recycle of reads water resources	caremade	because included new bullet as per AANDCs recommendations that
	EC	6.6.1.4 5th bullet - recommend inserting the words "capture and" before "treatment"	no edit made	includes the capture/recycling of this water
		6.6.1.6 2nd bullet - recommend the second bullet be revised to read "description of proposed de-watering		
		methods including a discussion of the potential uses for the water and disposal method(s) should there be		
	EC	a need to dispose any of the water resulting from dewatering	edit made	
6.6.2 Rankin Inlet Tank Farm,		. , 5	-	
Itivia Dock and Storage		An extra bullet be included to provide a description of a spill contingency plans for the tank farm facility as		
Facility	AANDC	well as the dock	edit made	
6.6.3 Waste Management	EC	6.6.3.1 3rd bullet - recommend including both long-term and short term acid generation and metal	edit made	

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Facilities		leaching potential. Also replace "acid generations and metal leaching" with "ARD and ML potential"		
	EC	6.6.3.1 4th bullet - recommend replacing acid rock drainage and ML with ARD and ML	edit made	
	EC	6.6.3.1 last bullet - recommend replacing "acid generation" with "ARD and ML"	edit made	
	50	6.6.3.1 recommend inserting a bullet on "estimation of the quantities of PAG and non-PAG materials that	100	
	EC	will be generated and details of the methodology used in classifying PAG and non-PAG	edit made	
	EC	6.6.3.4 5th bullet - recommend replacing "soil and/or runoff" with "soil, seepage and/or surface run-off"	edit made	
	AEM	6.6.3.6 Ship-based generated waste - eliminate as it falls outside the scope of the project	no edit made	As with other comments re: shipping, this requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
6.6.4 Ground Transportation and Associated Water		6.6.4 an extra bullet that describes the dust suppression methods, types of dust suppressants as well as		
Crossings	AANDC	mitigation methods for sedimentation during construction and operations.	edit made	
6.6.7 Borrow Pits and Quarry	50		1	
Sites	EC	6.6.7 in the 3rd bullet after "including", recommend inserting "ARD and ML potential,"	edit made	
6.6.9 Fuel and Explosives Facilities	EC	6.6.9 3rd bullet - recommend revising text as follows: proposed measures to ensure the fuel used for mine-related activities conforms with Canadian regulations (Government of Canada: 1990, 1991, 1997, 1999b, 1999c, and 2002b"	edit made	
6.6.10 Exploration	120	6.6.10 EC seeks clarification as to whether the proponent is planning to use seismic methods for	caremade	
	EC	exploration near water bodies. If the proponent intends to use seismic methods near water bodies, EC recommends this section be updated to require a description of potential impacts on aquatic life.		
7.0 Impact Methodology		The second secon		
7.1 Baseline Information Collection	AANDC	Recommends the following change "describe all proposed mitigation measures including pollution prevention and control actions, monitoring and follow-up plans, and cross reference to the specific plans where detailed information is located"		
	AANDC	Recommends that in addition to potential changes due to exploration activities - the guidelines should also require the Proponent to take into consideration and explain how any construction works for Phase 1 of the all-weather road, if the 12.10.2 exception is granted and the road constructed how this may potentially change baseline conditions.		
	EC	7.1 1st paragraph 3rd last line check the spelling of the word review	edit made	
	EC	7.1 2nd paragraph - recommend adding the following sentence at the end of the paragraph: "furthermore, to ensure post-monitoring impact analysis is not confounded by temporal variation, the Proponent should incorporate reference site sampling as part of its routine baseline sampling."	edit made	Edit made as per AANDC's recommendation.
7.5 Assessment Boundaries	AEM	7.5.1 transboundary implications of impacts of air transportation should not be included in the assessment	euitinade	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	7.5.1 shipping routes should not be included in the local study area and Regional study area as shipping routes have been used for many years to resupply Rankin Inlet		As with other comments re: shipping, this requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
7.6 VEC and VESCs	AEM	7.6.1 the following VECs should be removed from the guidelines in order to give the right focus for the assessment: Terrestrial ecology, landforms and soil, forage quality (section 8.1.8.2); aquatic ecology, macrophyes (section 8.1.9.1 and 8.1.9.2), marine ecology, marine wildlife and marine habitat, polar bear, sea birds		This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.

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	EC	7.6.1 remove the reference to SAR in VEC 10 to be consistent in the document	no edit made	was addressed in other edits
	EC	7.6.1 combine groundwater and surface water and freshwater aquatic environments into one VEC	no edit made	
7.7 Study Strategy and Methodology		recommends that if the study is presented as an independent appendix the Proponent should also provide an overview of the study in the main document, including the methodology used, assumptions made,		
	AANDC	interpretation of the result, limitations, and cross reference to the specific study	edit made	
	EC	7.7.1 1st paragraph note 2nd last sentence should be deleted as repeated in 3rd sentence	edit made	duplication
7.9 Impact Prediction	AANDC	recommend including "and explain their significance" to the last bullet of the section in order to clarify the determination of significance of the residual effects.	edit made	
	EC	7.9 2nd bullet - recommend deleting "and" and adding "model assumptions, study methodologies and sensitivity analyses"	edit made	
7.10 Impacts of the		7.10 suggest including a discussion on the impacts to freshwater ecosystems as well as terrestrial and		
Environment on the Project	DFO	marine ecosystems	edit made	
	AEM	7.10 impacts of sea-ice conditions, sea level trends and marine ice flow regimes on the Project - eliminate as it falls outside the scope of the project	no edit made	This requirement has been historically included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	7.10 Do not feel that global climate changes is too broad to be considered in the scope of the project. Some points mentioned in the guidelines are difficult to address in the course of a single project. AEM proposes to use a single scenario using the best scientific evidence available.	no edit made	This requirement has been historically included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	7.10 addressing direct and indirect impacts from climate change on terrestrial wildlife and wildlife habitat is considered outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AANDC	7.10 in the second paragraph in the list of long term impacts of changes on Project infrastructure, consider including tailing facility in the list in order to evaluate the potential impact of the environment (permafrost) on the tailings facility.	edit made	
7.12 Transboundary Impacts	AEM	7.12 Transboundary impacts associated with marine shipping on marine mammals, migratory birds and seabirds, and their habitat- eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
7.14 Significance Determination	AANDC	7.14 recommends clarifying to which impact the proponent is expected to assessing a significance determination.	edit made	clarification and linkages between sections in the document
	AANDC	the fourth paragraph AANDC recommends that the "level of uncertainty" be included in the list of attributes.		
8.0 Project Environment and Impact Assessment	AANDC	within the impact assessment for each VEC and VSEC, consider an evaluation of the temporal scale at which each impact may occur to help differentiate the short term and long term impacts of the project.	edit made	See last sentence in second paragraph
8.1.1 Air Quality	AEM	8.1.1.1 Baseline climate and meteorology information along proposed shipping routes - eliminate as it falls outside the scope of the project		This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	EC	8.1.1.12nd bullet - recommend removing evaporation sn sublimation rates"	edit made	
		8.1.1.2 2nd bullet - recommend revising bullet as follows "discussion on the climate parameters that may change due to Project emissions (GHGs and criteria air contaminants such as SO2, Nox, CO, volatile organic		
	EC	compounds (VOCs), O3, etc.)."	edit made	

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8.1.2 Climate and Meteorology		8.1.2.1 recommend revising bulleted list as follows - background ambient air quality data collected in the LSA and RSA including airborne dust (total suspended particulates (TSP), PM10 and PM2.5); current		
	EC	sources of criteria air contaminants and GHG emissions; and seasonal variations or climatic conditions associated with variations in air quality.	edit made	edit made when did internal revision
	AEM	8.1.2.2 Emission sources from marine vessels - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	EC	8.1.2.2 2nd bullet, sub-bullet 1 - recommend revising bullet as follows: "Criteria air contaminants (e.g., TSP, PM10, PM2.5, Nox, SO2, CO, VOCs, O3, etc.) and GHGs from the fuel consumption ofand other combustion sources)	edit made - Note: EC listed incorrect section number, 8.1.1.2	
	EC	8.1.2.2 5th bullet - recommend revising bullet as follows "assessment of effects on air quality from Project emissions during various Project stages; including airborne dust (TSP, PM10 and PM2.5, and/or metals) and criteria air contaminants such as SO2, Nox, CO, VOXs, O3 etc.	edit made - Note: EC listed incorrect section number, 8.1.1.2	
	EC	8.1.2.2 last bullet - recommend revising bullet as follows "a discussion of the potential effects of changes in air quality on human health and the environment"	edit made - Note: EC listed incorrect section number, 8.1.1.2	
8.1.3 Noise and Vibration	AEM	8.1.3.1 impact of noise and vibrations on marine environment - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	8.1.3.2 Potential changes in marine noise levels due to shipping activities, as well as noise propagation in the marine environment, and impact on marine mammals and marine environment - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	EC	3rd bullet, last sub-bullet - recommend adding "milling, smelting" after "screening"	edit made	
8.1.4 Terrestrial Environment	AEM	8.1.4.1 acquisition of the in-situ stress either with in-situ investigation or from other sources with reasonable confidence should be removed as this information can be estimated from tabulated values and from experience at other mining projects	no edit made	The NIRB's EIS guidelines allow information to be sourced from literature review therefore this type of request is accounted for
	AEM	8.1.5.2 [8.1.6.2] The reference to the source of water for Rankin Inlet should be more clearly specified. The lake is Nipisar Lake that Rankin Inlet draws its water from	edit made	
8.1.5 Geology	AEM	8.1.5.2 [8.1.6.2] evaluation of storm water runoff should be restricted to the Project Area [foot print], not the local study area	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
8.1.6 Hydrology	EC	8.1.6.1 [8.1.7.1] 2nd bullet - should also include dissolved oxygen (DO), dissolved metals, anions and cations.	edit made	
	EC	8.1.6.1 [8.1.7.1] 2nd bullet - after "recreational purposes" recommend adding "and the fish bearing status of the identified waterbodies as well as specifically identifying any other fish bearing waterbodies"	edit made	
	EC	8.1.6.1 [8.1.7.1] 3rd bullet - after "surface run-off" and before "traffic" recommend adding "seepage"	edit made	
2.1.2.2.10	EC	8.1.6.1 [8.1.7.1] 10th bullet - recommend adding groundwater in addition to surface water quality	edit made	
8.1.8 Sediment Quality	AEM	8.1.8.2 (8.1.10.2) remove reference to Thelon River	edit made	

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	AEM	8.1.8.2 (8.1.10.2) Potential impact on vegetation abundance and diversity from the introduction of invasive species through marine vessels and from shipping along the shoreline - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	EC	8.1.8.2 (8.1.10.2) 6th bullet - recommend removing reference to the "Thelon River crossing" as this river is not in the LSA	accepted change	
		8.1.8.2 (8.1.10.2) last bullet - recommend revising bullet as follows: "Discuss the potential introduction of invasive vegetative species (weedy species) along the shore line and all-weather road from mine-related	previous edits to document reflect this	
8.1.9 Freshwater Aquatic Environment	EC DFO	activities 8.1.9.1 recommend that the fish species in the local study area (LSA) be lake trout and arctic grayling as arctic char most likely do not inhabit the lakes and streams within the boundary of the LSA. Lake trout and arctic grayling would be the next most prolific fish species that are present within the LSA and should be discussed in detail.	recommendation	
	AEM	8.1.9.1 macrophytes should be excluded from freshwater aquatic environment and sediment quality		
	AEM	8.1.9.1 macrophytes should be excluded from freshwater aquatic environment and sediment quality	100	
	EC	8.1.9.1 9th bullet - recommend revising bullet as follows "description of the physical (e.g., DO, temperature, pH, conductivity, turbidity, tec.), and chemical (e.g., anions, cations, metals, nutrients, etc.) characteristics of freshwater and sediment quality in the LSA	edit made through previous edits to document	
	AEM	8.1.9.2 macrophytes should be excluded from freshwater aquatic environment and sediment quality	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
8.1.10 Vegetation	AEM	8.1.10 Potential impacts on environment on marine environment - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	8.1.10 marine environment sections should be reworded to include only the activities directly related to the project like unloading activities from vessels to the land	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
8.1.11 Terrestrial Wildlife and Wildlife Habitat	AEM	8.1.11 potential impacts on marine wildlife - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	marine wildlife section should be reworded to include only the activates directly related to the project like unloading activities from vessels to the land	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
8.1.12.1 [8.1.11.1] Birds and Bird Habitat	AEM	8.1.12.1 [8.1.11.1] reference to molydbenosis does not apply to any of the ore or waste rock units in Meliadine	edit made	
Dira Habitat	AEM	description of sea ice and marine water habitats - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.

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	AEM	8.1.12.2 [8.1.13.1] direct and indirect impacts from potential ice-breaking	edit made	
	EC	8.1.12.2 [8.1.11.2] 2nd bullet, 3rd sub-bullet - recommend adding following before fall freeze-up	edit made	
8.1.13 Marine Environment		8.1.13 [8.1.14.1] EC is of the opinion that marine birds should be considered as a part of Marine Wildlife		
		given they are an integral component of arctic marine ecosystems. Therefore, the guidelines of Section		
		8.1.11 should either be modified to include marine birds or the following bullets to from 8.1.11 should be		
		added to 8.1.13 and modified as underlines: Incidental spills, malfunctions and other accidents associated		
		with shipping operations and potential impacts to Marine birds; Ballast water discharge, with discussion		
		for the potential for discharge of contaminated ballast waters and related effects; Potential interactions, accidental injuries and mortality of Marine birds directly or indirectly from proposed shipping (open water		
		and potential lice breaking during break-up in the spring and freeze-up in the fall) activities, in particular		
		those Marine birds which congregate in areas where the shipping routes would pass through; - Potential		
		direct and indirect effects on Marine bird behaviour, distribution, abundance, migration patterns, species		
		health and reproduction from marine shipping; Evaluation of the potential for contaminants to be released		
		to the environment From marine shipping and taken up by Marine bird VECs as a result of the Project; and,		
		Assessment of potential cumulative effects on Marine bird VECs resulting from escalated marine traffic in		
		the RSA over the mining lifecycle (and including the potentially extended mine operation period).	Previous edits	
		Consideration should be given to the possible significant increase of marine vessel traffic along shipping	necessitate this	
	EC	routes.	being incorporated	
				This requirement has been included in the Guidelines issued for
		0.1.12 [0.1.14.1] description of helitatives as well as less majoratem bind sites and improvement bind areas		similar mining proposals, and so NIRB expects AEM to address this
	AEM	8.1.13 [8.1.14.1] description of habitat use as well as key migratory bird sites and important bird areas along the shipping routes - eliminate as it falls outside the scope of the project	no edit made	within the EIS as well as to provide justification where it is not able to provide such detail.
	ALIVI	8.1.13.2 last bullet - revise as follows "Potential impacts of bioaccumulation of contaminants via the food	no edit made	provide such detail.
	EC	chain"		
				This requirement has been included in the Guidelines issued for
				similar mining proposals, and so NIRB expects AEM to address this
	4514	8.1.13.2 potential disturbance to birds from noise and vibrations as a result of marine transportation -	19 1	within the EIS as well as to provide justification where it is not able to
8.2.8 Non-traditional Land	AEM	eliminate as it falls outside the scope of the project	no edit made	provide such detail. This requirement has been included in the Cuidelines issued for
Use and Resource Use				This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this
Ose and Resource Ose		8.2.8.2 Potential socio-economic impacts from shipping - eliminate as it falls outside the scope of the		within the EIS as well as to provide justification where it is not able to
	AEM	project	no edit made	provide such detail.
8.2.9 Cultural,	AEM	8.2.9.1 remove reference to Thelon River	edit made	
Archaeological and				This requirement has been included in the Guidelines issued for
Palaeontological Resources				similar mining proposals, and so NIRB expects AEM to address this
		8.2.9.2 impacts on marine transportation activities on paleontological/archaeological resources - eliminate		within the EIS as well as to provide justification where it is not able to
	AEM	as it falls outside the scope of the project	no edit made	provide such detail.
8.2.10 Individual and			edit made through	
Community Wellness	A E B 4	0.2.40.0 household easiel structures and austritismal manufactures and austritismal manufactures.	previous edits to	
9.2.11 Community	AEM	8.2.10.0 household social structures and nutritional requirements and country food	document	This requirement has been included in the Cuidelines issued for
8.2.11 Community Infrastructure and Public		8.2.11.2 potential to bring in freight for communities by return shipping and likelihood to share costs with local communities - eliminate as it does not apply to the Meliadine project as the project will be re-		This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this
Services		supplied using the same commercial marine shipping suppliers being used by the communities and the		within the EIS as well as to provide justification where it is not able to
JCI VICCS	AEM	Government of Nunavut already.	no edit made	provide such detail.
8.3 Human Health and	EC	recommends the last bullet be revised as follows "Criteria used to determine significance of impact;	edit made	P

Section	Commenter	Comment	Action	Justification
Environmental Risk Assessment		specifically, calculation of hazard quotients, which translates into the ratio between the predicted maximum exposure concentration for each contaminant of concern in each relevant media (i.e., air, water, soil, sedimetment) and the toxicity threshold of the most sensitive biological receptor in the respective medium for which toxicity information is available.		
9.1 Environmental Management Plan	AANDC	in the first paragraph, recommend that further clarification of what consists a "preliminary EMP" or a reference to any relevant document that outlines the requirements of a preliminary EMP be included in the guidelines.	edit made	
9.2 Environmental Protection Plan	AANDC	in the last paragraph recommend removing the words "if appropriate"	edit made	
9.3 Monitoring and Mitigation Plans	EC	3rd bullet - recommend removing this bullet as it pertains specifically to mine tailings and not to monitoring and mitigation plans in general.	edit made	
9.4 Biophysical Environmental Plans	AANDC	notes that a fuel management plan, a landfarm management plan and a post-closure monitoring and management plan are not included in section 9.4: recommend including a separate sub-section within Section 9.4 for each of these plans in the EIS guidelines		As there is no landfarm proposed for the project this plan does not appear to be required for the project. The other two suggestions have been integrated were applicable.
	AEM	9.4.1 The reference to the source of water for Rankin Inlet should be more clearly specified. The lake is Nipisar Lake that Rankin Inlet draws its water from	edit made	
	AEM	9.4.1 Risk management along shipping corridors - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	9.4.2 Oil handling facility contingency plan and shipboard oil pollution Emergency Plan - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AANDC	9.4.2 [9.4.3] recommends that water be added to bullet a - land and ice based contingency plans in order to reflect all the potential spill scenarios contained in this bullet.	edit made	
	EC	9.4.5 [9.4.6] 1st bullet - recommend replacing "runoff management" with "runoff and seepage management".	edit made	
	EC	9.4.5 [9.4.6] 2nd bullet - recommend replacing "runoff management" with runoff and seepage management"	edit made	
	AEM	9.4.7 [9.4.8] Shipping waste generated on board - eliminate as it falls outside the scope of the project	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	AEM	9.4.10 [9.4.11] Shipping management plan - eliminate as it falls outside the scope of the project & this is the carriers responsibility	no edit made	This requirement has been included in the Guidelines issued for similar mining proposals, and so NIRB expects AEM to address this within the EIS as well as to provide justification where it is not able to provide such detail.
	EC	9.4.13 [9.4.12] last bullet - recommend revising bullet as follows: "procedures for reporting of project emissions and monitoring results	edit made	
	DFO	9.4.15 [9.4.16] the Aquatic Effects Monitoring Plan should include the development and implementation of a fish-out program to remove the fish from the lakes that are proposed to be dewatered during construction of the mine and the tailings impoundment area.	edit made	This information is required by DFO in order to assess the impacts to fish, evaluate the mitigation, and to manage and monitor impacts to fish that inhabit the impacted lakes. The information will also be utilized to develop and implement an effective AEMP to identify, verify and mitigate impacts to fish and fish habitat.

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Section	Commenter	Comment	Action	Justification
		9.4.15 [9.4.16] last bullet - recommend making reference to the Environmental Effects Monitoring (EEM)		
	EC	program of the Metal Mining Effluent Regulations (MMER) here.	edit made	
				This requirement has been included in the Guidelines issued for
		9.4.16 [9.4.17] Measures to be applied to avoid or reduce the disturbance, harassment, injury or mortality	edit made to	similar mining proposals, and so NIRB expects AEM to address this
		of marine mammals due to shipping or potential ice breaking activities - eliminate as it falls outside of the	remove reference	within the EIS as well as to provide justification where it is not able to
	AEM	scope of the project	to ice breaking	provide such detail.
		9.4.16 [9.4.17] 10th bullet - recommend adding "and birds from landing on tailing impoundment area"		
	EC	after "pit areas"	edit made	
		9.4.17 [9.4.18] suggest that the No Net Loss plan should include details relating to the monitoring of the		Monitoring is imperative in order to evaluate the productive capacity
	DFO	offsetting measures that are required to be described in the NNLP.	edit made	of fish habitat following construction of offsetting measures.
9.6 Mine Closure and	EC	9.6 2nd bullet - recommend adding "goals and final land use objectives"	edit made	
Reclamation Plan		9.6 2nd last bullet - this should read "Any considerations for the restoration of the natural aesthetics of the		
	EC	project area and	edit made	
Appendix A		Suggest that EC's publication "guidelines for the Assessment of Alternatives for Mine Waste Disposal"		
	EC	(September 2011) be referenced in this section.	edit made	