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1240278

February 11, 2019

Ryan Barry
Executive Director
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Draft Project Certificate for Agnico Eagle Mines Limited's "Saline Effluent Discharge to the Marine Environment" Proposal Related to the Meliadine Gold Mine Project

Dear Mr. Barry,

On January 30, 2019, the Nunavut Impact Review Board (NIRB, Board) invited parties to comment on the *Draft* Project Certificate No. 006 Amendment 1, for Agnico Eagle Mines Limited's (Proponent) Saline Effluent Discharge to the Marine Environment proposal for the Meliadine Gold Mine Project.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the *Draft* Project Certificate No. 006 Amendment 1 for the Meliadine Gold Mine Project and offers the following comments for the NIRB's consideration:

CIRNAC Comment #1	
Subject	REVISED Term and Condition No. 25
Reference(s)	<ul style="list-style-type: none">• Draft Project Certificate No. 006 Amendment 1, page 23• CIRNAC Final Written Submission Comment #5
Comment(s)	CIRNAC is identified as a Responsible Party for Revised Term and Condition No. 25. Should CIRNAC be consulted with respect to the contents of the Groundwater Management Plan and any required mitigation measures, CIRNAC will endeavour

	to work with the Proponent as required under the Revised Term and Condition. To facilitate the Proponent's consultation efforts, CIRNAC notes that its Impact Assessment Division should be the departmental contact concerning this Revised Term and Condition.
Recommendation(s)	<ol style="list-style-type: none"> 1) CIRNAC recommends the "Category" section be updated to reflect the name of the plan as noted in the Revised Term and Condition, i.e. "Groundwater Management Plan". 2) CIRNAC recommends the "Reporting Requirements" section include a clarification of the approval process for the Groundwater Management Plan, if any is envisioned by the NIRB for the Revised Term and Condition No. 25.

CIRNAC Comment #2	
Subject	Term and Condition No. 88 and 89
Reference(s)	<ul style="list-style-type: none"> • Draft Project Certificate No. 006 Amendment 1, page 50
Comment(s)	Crown-Indigenous Relations and Northern Affairs Canada is listed as a Responsible Party under its previous title: AANDC.
Recommendation(s)	CIRNAC recommends the "Responsible Parties" section be updated to reflect the current title of the department: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).

CIRNAC Comment #3	
Subject	Term and Condition No. 90
Reference(s)	<ul style="list-style-type: none"> • Draft Project Certificate No. 006 Amendment 1, page 52
Comment(s)	NIRB requires that the Proponent's analysis should be provided to the NIRB within nine (9) months of the issuance of the amended Project Certificate. It also requires that any updates to the analyses should be provided to the NIRB as completed by the Proponent. CIRNAC requests that the results of the analysis be shared with the Regional Socio-Economic Monitoring Committee in addition to the NIRB.



Recommendation(s)	CIRNAC recommends the NIRB include in its Reporting Requirements that the Proponent share its findings and analyses with the Regional Socio-Economic Monitoring Committee throughout the life of the project.
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CIRNAC Comment #4	
Subject	Term and Condition No. 93
Reference(s)	<ul style="list-style-type: none"> Draft Project Certificate No. 006 Amendment 1, page 53
Comment(s)	NIRB is encouraging the Proponent to register all trades occupations, journeypersons and apprentices working with the Project and to register any trades occupations listed in its forecast, as well as to provide the Government of Nunavut with information regarding the number of registered apprentices and journeypersons from other jurisdictions employed at the Project during each year of the Project's life. The NIRB is also requiring that information regarding the Proponent's fulfillment of this term and condition shall be included in the Proponent's annual report to the NIRB. CIRNAC requests that this information also be provided to the Regional Socio-Economic Monitoring Committee.
Recommendation(s)	CIRNAC recommends the NIRB include in its Reporting Requirements that the information provided to the NIRB in fulfillment of this Term and Condition also be shared with the Regional Socio-Economic Monitoring Committee throughout the life of the project.

CIRNAC Comment #5	
Subject	Term and Condition No. 97
Reference(s)	<ul style="list-style-type: none"> Draft Project Certificate No. 006 Amendment 1, page 55
Comment(s)	NIRB is requiring the Proponent to ensure that its project-specific socio-economic monitoring program should be updated to address the potential impacts to education and training which may arise from temporary, final and/or post-closure phases and that the information be provided in its annual report to the NIRB. CIRNAC requests that this information also be provided to the Regional Socio-Economic Monitoring Committee throughout the life of the project.



Recommendation(s)	CIRNAC recommends the NIRB include in its Reporting Requirements that the information provided to the NIRB in fulfillment of this Term and Condition also be shared with the Regional Socio-Economic Monitoring Committee throughout the life of the project.
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CIRNAC Comment #6	
Subject	Term and Condition No. 103
Reference(s)	<ul style="list-style-type: none"> Draft Project Certificate No. 006 Amendment 1, page 58
Comment(s)	<p>NIRB is encouraging the Proponent to consult with the Kangiqliniq Hunters and Trappers Organization and the Kivalliq Socio-Economic Monitoring Committee and to make all reasonable efforts to engage Elders and community members of the Kivalliq communities in order to have community level input into updates to its monitoring plans, programs and mitigative measures. This type of engagement will ensure that these programs and measures have been informed by traditional activities, cultural resources, and land use as such may be implicated or impacted by ongoing Project activities. All plans are to include a feedback mechanism to ensure that it's project-specific socio-economic monitoring program should be updated to address the potential impacts to education and training which may arise from temporary, final and/or post-closure phases and that the information be provided in its annual report to the NIRB. CIRNAC requests that this information also be provided to the Regional Socio-Economic Monitoring Committee throughout the life of the project. The NIRB is requiring that updated plans shall be submitted to the NIRB 30 days prior to their revision/finalization. Further, the Proponent shall provide a summary discussion of its implementation of this term and condition (including the results of monitoring, adaptive management strategies, consultation, and contribution efforts undertaken) to the NIRB through the Proponent's annual monitoring report. CIRNAC request that this information also be provided to the Regional Socio-Economic Monitoring Committee.</p>
Recommendation(s)	CIRNAC recommends the NIRB include in its Reporting Requirements that the information provided to the NIRB in fulfillment of this Term and Condition also be shared with the Regional Socio-Economic Monitoring Committee throughout



	the life of the project.
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CIRNAC Comment #7	
Subject	Term and Condition No. 105
Reference(s)	<ul style="list-style-type: none"> Draft Project Certificate No. 006 Amendment 1, page 59
Comment(s)	NIRB is strongly encouraging the Proponent to consider incorporating information obtained from local outfitting and guiding businesses into its Hunter Harvest Survey where possible, and to include these organizations as potential respondents to surveys undertaken. In addition the NIRB is requiring that the Proponent provide a summary discussion of its implementation of this term and condition (including results of monitoring, adaptive management strategies, consultation, and contribution efforts) to the NIRB through the Proponent's annual monitoring report. CIRNAC is requesting that these summaries also be provided to the Regional Socio-Economic Monitoring Committee.
Recommendation(s)	CIRNAC recommends that the NIRB include in its Reporting Requirements that the summaries provided to the NIRB in fulfillment of this T&C also be shared with the Regional Socio-Economic Monitoring Committee throughout the life of the project.

CIRNAC Comment #8	
Subject	NEW Term and Condition No. 128
Reference(s)	<ul style="list-style-type: none"> Draft Project Certificate No. 006 Amendment 1, page 71
Comment(s)	CIRNAC is identified as a Responsible Party for New Term and Condition No. 128. In its lands use authorization process, CIRNAC will request the information in the Term and Condition, i.e.: <i>“a detailed design for the system that includes the location of the pipeline in relation to the saline effluent storage tank at Itivia, the location of submerged collars supporting the pipeline and the design of the diffuser”</i> .



CIRNAC Comment #9	
Subject	NEW Term and Condition No. 129
Reference(s)	<ul style="list-style-type: none"> Draft Project Certificate No. 006 Amendment 1, page 71
Comment(s)	CIRNAC is identified as a Responsible Party for New Term and Condition No. 129. The information requested in the Term and Condition, i.e.: <i>“a hazard and operability assessment of the pipeline and marine outfall system”</i> , is not a requirement in the land use authorization process. To facilitate the implementation of the New Term and Condition, CIRNAC will liaise with the Proponent and the NIRB regarding the requirements/expectations of the hazard and operability assessment during the land use authorization process.

CIRNAC Comment #10	
Subject	NEW Term and Condition No. 130
Reference(s)	<ul style="list-style-type: none"> Draft Project Certificate No. 006 Amendment 1, page 71
Comment(s)	CIRNAC is identified as a Responsible Party for New Term and Condition No. 130. In its land use authorization, CIRNAC will include the provision that the pipeline must be removed upon conclusion of the activity unless a determination is made by the NIRB that states the pipeline can remain in place.

With the comments provided above, CIRNAC does not require a Project Certificate Workshop. Should the Board decide to hold a workshop and invite interested parties, CIRNAC would be available to participate on February 15, 2019.

CIRNAC appreciates the opportunity to provide comments and will remain available to work with the NIRB and the Proponent, as necessary, throughout any further monitoring or review phases related to this project. Should you have any questions, please contact Julia Prokopick at (867) 975-4567 or by e-mail at Julia.Prokopick@canada.ca.

Sincerely,

[Original signed by]

Spencer Dewar
Director, Resource Management

