



**NIRB File No.: 11MN034**  
NWB File No.: 2AM-MEL1631  
NPC File No.: 149337

June 9, 2020

To: The Honourable Daniel Vandal, P.C., M.P.  
Minister of Northern Affairs  
Government of Canada  
House of Commons  
Ottawa, ON K1A 0A6

Jamie Quesnel  
Regional Manager – Permitting and Regulatory Affairs  
Agnico Eagle Mines Limited  
Baker Lake, NU X0C 0A0

Sent via email: [dan.vandal@parl.gc.ca](mailto:dan.vandal@parl.gc.ca) and [jamie.quesnel@agnicoeagle.com](mailto:jamie.quesnel@agnicoeagle.com)

**Re: Notice and Guidance Regarding the Nunavut Impact Review Board's Processing of Agnico Eagle Mines Limited's "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine, Nunavut" Project Proposal**

Dear Honourable Daniel Vandal and Jamie Quesnel:

This correspondence is intended to provide notice as required by s. 112(3) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*) that the Nunavut Impact Review Board (NIRB or Board) is initiating a formal reconsideration of the terms and conditions of Project Certificate No. 006 in light of Agnico Eagle Mines Limited's "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine" project proposal, a proposed amendment to the approved Meliadine Gold Mine Project (NIRB File No.: 11MN034) (the Project).

#### PROCEDURAL HISTORY

Following approval of Amendment 1 of Project Certificate No. 006 for the Meliadine Gold Mine 2018 Saline Effluent Proposal, on March 25, 2020 the Nunavut Impact Review Board (NIRB or Board) received a referral from the Nunavut Planning Commission (the Commission) to assess

Agnico Eagle Mines Limited's (Agnico Eagle or the Proponent) "Saline Effluent Discharge to Marine Environment"<sup>1</sup> Project Proposal and an associated positive conformity determination with the Keewatin Regional Land Use Plan. The Commission referred this proposal to the NIRB for assessment as it involves development of a component or activity that was not previously assessed by the NIRB, and represents a significant modification to the approved project under Section 12.4.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)*.

Agnico Eagle submitted an application to the NIRB on April 7, 2020, which proposes to develop a waterline to convey saline effluent from the Meliadine mine site to the existing facility at Itivia Harbour, for discharge of an increased volume of saline effluent to the marine environment, replacing the currently approved trucking method.

Construction of the infrastructure is proposed to begin in 2020 and would be used for the discharge of saline effluent as early as May 2021, remain in place for the life of the mine, and involve the following works or activities:

- Construction and operation of a waterline pipe from the Meliadine mine site to the Itivia facility along the all-weather access road (AWAR) and by-pass road specifically:
  - Installation of two (2) waterlines of 16-inch diameter, running alongside the existing roads and within the easement of the existing roads;
  - Connection of waterlines to a modified pump house/sampling station at the Itivia facility;
- Installation, operation and decommissioning of a new pipeline extending from the pump house at the existing Itivia facility to a discharge location in Melvin Bay:
  - Discharge location approximately 250 metres (m) northwest of the existing approved pipeline;
  - Use of horizontal directional drilling (HDD) method to construct an underground corridor for the pipeline;
  - Pipeline would extend underground from the pump house to approximately seven (7) m depth below the water surface, and continue on the sea floor to an engineered diffuser at 20 m depth;
  - Pipeline would remain in place following decommissioning of the facility; and
- Discharge of saline effluent into Melvin Bay at a rate of 6,000 cubic metres (m<sup>3</sup>) to 12,000 m<sup>3</sup> per day during the open water season.

All documentation associated with the Saline Effluent Discharge to Marine Environment Project Proposal, including application materials filed by the Proponent with the NIRB can be accessed from the NIRB's online public registry at [www.nirb.ca/project/125515](http://www.nirb.ca/project/125515).

Agnico Eagle's submission included a self-assessment in accordance with the factors for determining significance set out under s. 90 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*). Considering these factors, Agnico Eagle concluded that the changes proposed do not constitute significant modifications to the approved project, and any impacts associated with these changes could be effectively mitigated without requiring changes to

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<sup>1</sup> Full title "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine, Nunavut"

the terms and conditions of Project Certificate No. 006, Amendment 1 for the Meliadine Gold Mine Project<sup>2</sup>. The Proponent also clarified that it has not applied for an amendment to the Project Certificate No. 006, and does not consider reconsideration of the terms and conditions to be necessary. However, Agnico Eagle is of the view that, should the Board decide that further assessment is necessary, the process timelines should be condensed to allow for construction of the waterline components to begin in August 2020.

On April 14, 2020, the NIRB solicited comments on Agnico Eagle's Saline Effluent Discharge to Marine Environment Project Proposal from interested parties and regulatory authorities for the Meliadine Gold Mine Project. Specifically, the Board requested comment on whether the proposal warranted reconsideration of the existing Project Certificate No. 006 for the Meliadine Gold Mine Project, in accordance with Section 12.8.2 of the *Nunavut Agreement* and s. 112(1) of the *NuPPAA* and further provide information on the significance of the proposed amendment.

The comments received from regulatory authorities, Inuit organizations and members of the public by May 8, 2020 provided input on the scope and significance of the Saline Effluent Discharge to Marine Environment Proposal<sup>3</sup>. In contrast with the Proponent's view, these commenting parties agreed that the proposal constitutes a significant modification to the Project as previously assessed, noting that the proposed activities could have significant negative ecosystemic and socio-economic impacts, and cause significant public concern. Parties were also in agreement that the proposed activities would likely require a reconsideration of the terms and conditions of NIRB Project Certificate No. 006. See [Appendix A](#) for a summary of parties' comments.

#### GUIDANCE REGARDING PROCESSING OF PROPOSAL

In general, where an approved project is already governed by the terms and conditions of a NIRB Project Certificate, to determine the process and procedure guiding NIRB's assessment of any modification proposal the Board must consider the following questions:

- Is the proposed modification included within the scope of the original project as previously assessed by the NIRB?
- Is the proposed modification consistent with the terms and conditions of the existing NIRB Project Certificate, or are changes to the Project Certificate necessary to reflect the modification?
- Does the proposed modification constitute a significant modification to the original project that is integrally linked to the original project (or project as subsequently modified by any modification proposals that have been assessed and approved by the NIRB)?
- Does the proposed modification constitute a significant modification to the original project that is not integrally linked to the original project, and that has sufficient scope to be assessed as an independent project proposal?

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<sup>2</sup> Nunavut Impact Review Board, Reconsideration Report and Recommendations, Saline Effluent Discharge to Marine Environment Proposal, Agnico Eagle Mines Limited, NIRB File No. 11MN034, October 31, 2018 (the 2018 Saline Effluent Discharge Proposal). Public Registry ID: 320879.

<sup>3</sup> Public Registry ID: 329886, 329873, 329289, 329800, 329614, 329743, 329571, 329869, 329884, 329831, 329832, 329605, 329881, 329414, 329870, 329389, 329421, 329867, 329796, 329600, 329837.

In respect of Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal, the Board has concluded the following:

- Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal constitutes both a significant modification to the original project and a significant modification to the scope of the 2018 Saline Effluent Discharge Proposal.
- Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal is integrally linked to the original Meliadine Gold Mine Project (including as modified by the 2018 Saline Effluent Discharge Proposal).
- Should the Board determine that the proposed modifications are acceptable, amendments to the existing terms and conditions of the Meliadine Gold Mine Project Certificate No. 006 may be necessary to reflect the potential for ecosystemic and socio-economic impacts resulting from the proposed modifications.

On the basis of the Commission's referral, the information provided by the Proponent, the comments received by interested parties and the Board's own review of the scope of the previously-approved Meliadine Gold Mine Project and 2018 Saline Effluent Discharge Proposal, the NIRB agrees that based on the potential for public concern and for adverse ecosystemic effects that could be greater than those previously assessed by the NIRB during the Board's Review of the original Project and subsequent 2018 Saline Effluent Discharge Project, the "Saline Effluent Discharge to Marine Environment" Proposal constitutes a significant modification to the previously assessed Project. Consequently, as set out in s. 146(1) of the *NuPPAA*, the Board agrees with the determination of the Commission and the submissions of parties that the Saline Effluent Discharge to Marine Environment Project Proposal must be assessed by the NIRB. Recognizing the Board's above conclusions, in the NIRB's view it is appropriate to conduct the assessment of the Saline Effluent Discharge to Marine Environment Project Proposal as a reconsideration of the terms and conditions of Project Certificate No. 006.

#### NOTICE OF RECONSIDERATION

On this basis, the Board has decided that Article 12, Section 12.8.2(b) and (c) of the *Nunavut Agreement* and s. 112(b) and (c) of the *NuPPAA* (changed circumstances and technological innovations) trigger the reconsideration of the terms and conditions of Project Certificate No. 006 in light of the Saline Effluent Discharge to Marine Environment Project Proposal. As required by s. 112(3) of the *NuPPAA*, the NIRB is providing notice of a formal reconsideration of the terms and conditions of Project Certificate No. 006.

#### RECONSIDERATION PROCESS: NEXT STEPS

While the NIRB does have considerable discretion as to the precise process for conducting a reconsideration of Project Certificate terms and conditions under Section 12.8.2 of the *Nunavut Agreement* and s. 112 of *NuPPAA*, the NIRB's primary objectives apply to reconsiderations and generally dictate that the NIRB conduct an assessment of the modification proposal with as much rigor as a NIRB screening and sometimes even a review. The flexibility and discretion granted to the NIRB to determine the appropriate process for the assessment of modification proposals through reconsideration of Project Certificate terms and conditions reflects that the scale and scope of the changes requested may vary considerably as previously-approved projects are developed,

operated, decommissioned, and reclaimed. In an era where “phased development” has become the norm, the flexibility built into the reconsideration process is essential to delivering timely but thorough assessments that are appropriate in scope.

Having determined that a reconsideration of the terms and conditions of Project Certificate No. 006 is necessary, the Board would like to provide Agnico Eagle and parties with direction regarding the anticipated next steps in the assessment process. Where the NIRB has established that terms and conditions within a Project Certificate require reconsideration, the Board initiates a public review of the application in accordance with the NIRB’s Rules of Procedure.<sup>4</sup> Following the NIRB’s direction in fulfillment of its scoping under s. 99 of the *NuPPAA* and guidelines under s. 101 of the *NuPPAA*, Agnico Eagle will be required to provide any information determined necessary to facilitate the assessment process. At the conclusion of the assessment, the Board is required under s. 112(5) of the *NuPPAA* to provide a report of its reconsideration of the Project Certificate terms and conditions to the Responsible Minister(s) for consideration, and, based on the Ministers’ acceptance and/or variance of this report, the NIRB would amend the Project Certificate as necessary.

Although Agnico Eagle noted its desire to start construction in August 2020, the NIRB requires adequate time to complete its assessment of the potential for impacts associated with the modified activities, and to identify appropriate monitoring, management and mitigation measures. Therefore, the Board emphasizes to the Proponent that given the current circumstances and the need for adequate process and procedural fairness of all parties, it is not realistic for the Proponent to plan for construction activities to begin in August 2020. The NIRB therefore will be recommending that Agnico Eagle provide within its Impact Statement (IS) Addendum a comprehensive alternatives analysis that includes alternative construction schedule scenarios, that will ensure the Proponent complies with all regulatory approvals and requirements.

In considering the appropriate process for the reconsideration, the Board is mindful of orders and directions of public health authorities in response to COVID-19, such as current restrictions on travel and public gatherings. Given the public health directions and the aspect of uncertainty that the pandemic places on the scheduling of public events into the future, the Board recognizes that it is not appropriate to set out a precise process for the reconsideration at this time. However, the NIRB remains committed to conduct its process in a manner that reflects the requirements of procedural fairness and intends to engage parties in determining the appropriate process going forward.

In the interim, the Board requests that the Minister consider providing participant funding to enable parties to participate fully in the assessment, as parties have already indicated that this funding is necessary to allow for meaningful participation in a NIRB reconsideration (see **Appendix A**). While the Board is not yet able to provide detailed steps for this assessment, the time required for Agnico Eagle to submit its IS Addendum will provide an opportunity for the Board to also better understand developments in the territory’s meeting and travel restrictions in addition to any further direction the Minister’s office may provide.

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<sup>4</sup> NIRB Rules of Procedure, September 3, 2009.

To facilitate the NIRB's assessment of the potential ecosystemic and socio-economic impacts associated with the Saline Effluent to Marine Environment Proposal, in the coming days the NIRB will be initiating its scoping and development of guidelines to the Proponent for submission of its IS Addendum to supplement its April 7, 2020 application.

In addition to providing notice to the Minister under s. 112(3) of the *NuPPAA*, highlighting some key factors which apply to the Board's further assessment of the Saline Effluent Marine Environment Proposal, the Board is also inviting the Minister to provide any further direction he considers necessary. Specifically, the Board would appreciate receiving the Minister's direction with respect to priorities and reasonable timelines associated with the Board's reconsideration of the terms and conditions of the Project Certificate No. 006 as set out under Article 12, Section 12.5.4 of the *Nunavut Agreement*, any guidance related to the key factors considered by the Board during the reconsideration, and the availability of participant funding.

## CONCLUSION

As noted above, in the coming days the NIRB will provide further direction to Agnico Eagle regarding the specific information requirements to be addressed in the Proponent's IS Addendum submission. The Board is also prepared to engage directly with interested parties to facilitate additional discussion of the appropriate process going forward, and will be reaching out to parties in the days ahead.

The Board looks forward to receiving any direction from the Minister associated with the Board's reconsideration of Project Certificate No. 006. In the interim, should you have any questions regarding the preceding, please contact the NIRB's Executive Director, Karen Costello at [kcostello@nirb.ca](mailto:kcostello@nirb.ca).

Sincerely,



Kaviq Kaluraq  
Chairperson  
Nunavut Impact Review Board

cc: Meliadine Distribution List  
Jamie Quesnel, Agnico Eagle Mines Limited  
Manon Turmel, Agnico Eagle Mines Limited  
Michel Groleau, Agnico Eagle Mines Limited  
Stephanie Autut, Nunavut Water Board  
Karén Kharatyan, Nunavut Water Board

Carson Gillis, Nunavut Tunngavik Inc.  
Luis Manzo, Kivalliq Inuit Association  
Natalie O'Grady, Government of Nunavut  
Amy Robinson, Government of Nunavut  
Saba Qazi, Northern Projects Management Office  
Adrian Paradis, Northern Projects Management Office  
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs  
John Olyslager, Environment and Climate Change Canada  
Daniel Coombs, Fisheries and Oceans Canada  
Anita Gudmundson, Transport Canada

## APPENDIX A: SUMMARY OF COMMENTS REGARDING THE SALINE EFFLUENT DISCHARGE TO MARINE ENVIRONMENT PROJECT PROPOSAL

On or before May 8, 2020 the NIRB received comments from regulatory authorities, Inuit organizations and members of the public that provided input on the scope and significance of the “Saline Effluent Discharge to Marine Environment” Project Proposal. Specifically the NIRB invited comment on the following:

- a) *Whether the proposed modification constitutes a significant modification to the original project as previously assessed and subsequently modified and approved by the NIRB;*
- b) *Whether the proposed modification is consistent with the terms and conditions of the existing Project Certificate No. 006, Amendment 1, or are changes to the Project Certificate necessary to reflect the modification; and*
- c) *Any matter of importance to the commenting party related to the Board’s processing of the project proposal.*

With respect to significance, members of the public, Inuit organizations, and regulatory authorities agreed that the scale and scope of activities proposed in the “Saline Effluent Discharge to Marine Environment” represent a significant modification to the project as previously assessed. Parties noted that the proposed installation of a waterline along the all-weather access road (AWAR) to transport an estimated saline discharge volume of 6000 m<sup>3</sup> to 12000 m<sup>3</sup> per day could have significant negative ecosystemic and socio-economic impacts, and cause significant public concern.

Overall, parties agreed that the proposed activities would likely require reconsideration of the terms and conditions of the Project Certificate No. 006. While parties identified several existing terms and conditions (43, 44, 54) that relate to monitoring and mitigation of effects to terrestrial wildlife and the terrestrial environment, they also noted that further assessment would help in identifying relevant modifications to the Project Certificate that may be required in order to address potential impacts from the proposed activities. In addition, regulatory authorities noted that regulatory review and approval would likely be required for components of the proposal associated with watercourse crossings. Further, the Kivalliq Inuit Association (KivIA) made note that the KivIA’s Lease for Inuit-Owned Lands (KVRW11F02) does not currently authorize the proposed waterline, and may require an amendment that would benefit from further assessment of the proposal.

Table 1 summarizes the comments received from parties with respect to the Saline Effluent Discharge to Marine Environment Proposal.

**Table 1. Summary of Comments from Regulatory Authorities, Inuit Organizations and Community Organizations**

Topic	Party	Comment Summary
Significance	NTI	Significant modification and are in agreement with other Inuit organizations. Proposed activities that have not been

		adequately assessed and may have significant impacts include the construction and operation of a waterline/pipeline from the Meliadine mine to Itivia, operation of new discharge location, and increased level of discharge to Melvin Bay.
	<b>KivIA</b>	The Waterline Proposal does constitute a significant modification to the original project as previously assessed and subsequently modified and approved by the NIRB.
	<b>GN</b>	Defers to NIRB and the Commission on significance
	<b>CIRNAC</b>	Proposal constitutes a significant modification to the original project as previously assessed and subsequently modified and approved by the NIRB. Based on the following considerations: a) waterline pipe not identified as preferred option in alternatives assessment (FEIS SD 2-1 Report) b) new line extending from pumphouse to discharge point not included in original assessment c) increase to discharge flow rates represents a significant modification to scope as previously assessed in 2018 Amendment.
	<b>KHTO</b>	Not in support. Increased volume discharge greatly exceeds that previously assessed, is a significant modification and requires reassessment.
	<b>BLHTO</b>	<ul style="list-style-type: none"> <li>▪ Changes constitute significant modification under section 146 of the NuPPAA.</li> <li>▪ Proposed changes may have significant negative impacts to Nunavut's ecosystems and will cause significant public concern in the Kivalliq.</li> </ul>
Process	<b>NTI</b>	Recommends proposed activities that have not been sufficiently reviewed previously be assessed by the NIRB.
	<b>KivIA</b>	Suggests that, based on the current normalcy of remote work, a condensed schedule may be appropriate to provide sufficient review and consideration of both the Waterline Proposal and the 2020 Saline Discharge Strategy. This schedule may allow waterline construction to begin in 2020, as proposed by Agnico Eagle, following the conclusion of the NIRB process and implementation of appropriate terms and conditions.
	<b>CIRNAC</b>	Assessment is warranted in order to identify potential adverse effects to VEC and VSECs; Assessment may lead to the identification of existing terms and conditions which may require updates or new terms and conditions to be included in the amended PC No. 006 to reflect the newly proposed changes.
	<b>DFO</b>	Anticipates any concerns with respect to fish and fish habitat will be addressed through DFO regulatory process, should the NIRB approve the project, and has no further comments.

	<b>KWB</b>	<ul style="list-style-type: none"> <li>▪ Recommends a full reconsideration and assessment for proposed modifications. Should follow the timelines of NA and NuPPAA.</li> <li>▪ Important that parties within the Kivalliq, including HTOs of five communities within the Qamanirjuaq caribou herd range can participate in the assessment.</li> <li>▪ Concern with manner that Agnico Eagle has proposed changes to NIRB. Significant changes should not be permitted through an annual report.</li> </ul>
	<b>KHTO</b>	Hopes the proposed modifications will be reassessed by NIRB and that KHTO will be consulted and informed about the project and able to participate in the assessment.
	<b>IHTO</b>	<ul style="list-style-type: none"> <li>▪ Does not support the project as proposed and requests a reconsideration hearing is held to the amendment proposal.</li> <li>▪ Concern that this is not going through the normal assessment process and feels should be subject to full review by affected stakeholders.</li> </ul>
	<b>BLHTO</b>	Recommends any reconsideration of the Project Certificate for the Meliadine Mine involve public consultation process that includes public meeting organized by NIRB in all potentially affected communities and in-person public hearing.
Project Certificate	<b>KivIA</b>	The proposed modification will require changes to the Project Certificate necessary to reflect the modification.
	<b>KWB</b>	Proposed project would infringe on wildlife-related TCs, e.g. TC 54 related to ensuring project infrastructure including roads/trails etc. are constructed to allow for safe passage of caribou.
Regulatory approval	<b>DFO</b>	Proponent will be required to submit a <i>Request for Review</i> of proposed amendment as watercourse crossing are associated with the additional pipeline installation. Watercourse crossings are subject to review for: 1) harmful alterations, disruption or destruction of fish habitat; 2) effects to aquatic species at risk, any part of their critical habitat or residences of their individuals; 3) introduction of aquatic species into regions or bodies of water frequented by fish where they are not indigenous.
	<b>TC</b>	Watercourse crossings associated with the additional pipeline from the mine site to Itivia Harbour, and discharge line in Melvin Bay may be subject to review under the <i>Canadian Navigable Waters Act</i> (CNWA); Although regulatory approval may be required, TC does not have a position on significance of the modification, and will take its direction from the NIRB.
Participant Funding	<b>KWB</b>	Participant funding should be provided to allow full participation.

	<b>BLHTO</b>	Request Participant Funding to participate in process.
COVID-19	<b>KivIA</b>	COVID-19 pandemic creates unique and important concerns with the waterline proposal, particularly during construction phase scheduled to begin in August 2020. Further assessment should clarify how Agnico Eagle will implement public health precautions. Failure to assess and mitigate epidemiological risks could create a legitimate emergency.
	<b>KHTO</b>	KHTO is unable to hold full meetings and very challenging to address major issues like these proposed modifications, due to pandemic. Request that NIRB take this into consideration and consider longer timelines than usual for conducting its procedures and operations.
Technology	<b>BLHTO</b>	Proposed changes involve technology that has not yet been tested in Nunavut. According to Section 12.4 of the NA and section 89 of NuPPAA, factors usually trigger a full environmental review with significant public engagement.

In addition to the feedback provided by regulators and Inuit organizations, numerous submissions were provided by members of the public and Nunavummiut on both proposals. Table 2 that follows summarizes the submissions from public and community members:

**Table 2. Summary of Comments from Community Members and Members of the Public**

Name	Comment Summary
<b>H Misherlak</b>	<ul style="list-style-type: none"> <li>Concern of adverse impacts the construction period may have to wildlife and community. What is the duration of construction and construction traffic? Will construction traffic be in addition to increased saline truck traffic? Traffic has been a concern in the past and the company is not in compliance with dust control.</li> </ul>
<b>J Innuksuk</b>	<ul style="list-style-type: none"> <li>Requested clarification on several aspects of the scope of activities noted in the current application especially in relation to operations at the other Agnico Eagle projects.</li> <li>Questions on justification of the increased volume of water and seeking additional understanding of the impacts: <ul style="list-style-type: none"> <li>In the 2017 application, the proponent provided an educated estimate that saline water volumes would be only 300-340 between 2020–2022. Despite that submission being merely two years ago, the volume the proponent is now seeking is 5x higher with the pipeline capability of discharging even more. That is not a minor modification but a significant deviance which may result in significantly different environmental impacts then originally intended and it's my opinion that such a change requires regulatory assessment prior to approval.</li> <li>Initial application stated groundwater is likely to exhibit ammonia and nitrate, fuel oil and emulsion explosives from activity related to mine development. How can the proponent assure that marine life will not be affected/contaminated considering already demonstrated failures in water treatment from original application?</li> </ul> </li> </ul>

Name	Comment Summary
<b>S Oolooyuk</b>	<ul style="list-style-type: none"> <li>▪ Concern of contaminants being discharged to drinking and fishing water. Does not want to see dead fish or polluted water that they use for drinking and fishing.</li> <li>▪ Road closures are not occurring when caribou are close to the mine, and the company waits if they can before shutting down. Caribou do not follow their usual migration route through the mine site. Mine burns garbage which produces black smoke and strong lights are left on 24 hrs/day which scares the caribou.</li> <li>▪ ATV trail taken over by mine road and harvesters need permission to go hunting and fishing there.</li> </ul>
<b>B Zawadski</b>	<ul style="list-style-type: none"> <li>▪ Proposed modification constitutes a significant modification to the project as assessed and approved and must be subject to a comprehensive review and the Project Certificate amended to include any approved changes. Proposed changes should be fully reviewed and reassessed, including detailed community consultation. Pipeline mentioned briefly in the 2014 Alternatives Assessment, but not presented as a serious option or included in community consultation. Pipeline is significantly different than trucking as method of transportation of saline effluent and disagrees with Agnico Eagle determination that the proposed modifications do not have the potential to result in significant impacts.</li> <li>▪ Request for additional information on components and impacts such as: <ul style="list-style-type: none"> <li>○ have the socio-economic differences and costs been analyzed and presented as part of the proposal; differences between employment and earnings; and which option provides the best socio-economic returns for the community such as employment or business opportunities.</li> </ul> </li> <li>▪ The output of the double pipeline will be an order of magnitude greater than previously assessed.</li> <li>▪ Proposal does not support the construction of the pipeline; clarification required on the outside dimension of the pipe, what supported the conclusions of impacts to caribou, community and hunter movement around the infrastructure, and reduction in greenhouse gasses, and why initial studies supported such an underestimation of groundwater inflows.</li> <li>▪ Disagrees with Agnico Eagle assessment of impacts to caribou presented in the proposal, considers that caribou will not cross the pipeline, and further questions on impacts to caribou provided.</li> <li>▪ Have studies of the diffuser accounted for discharge volume of 12000m<sup>3</sup>/day? More research should be done on oceanographic dynamics in Melvin Bay in terms of flushing rate into and out of bay. Has the flushing rate of Melvin Bay been studied to support the dilution model?</li> <li>▪ Concentrated saline water could accumulate at bottom of the bay and cause impacts to marine organisms and environment.</li> <li>▪ Effluent could contain contaminants such as aluminum that could impact marine environment.</li> <li>▪ Sampling protocol proposed not rigorous enough to provided level of confidence in the data. Sampling should be more frequent and multiple samples collected.</li> </ul>

Name	Comment Summary
	<ul style="list-style-type: none"> <li>▪ Has Agnico Eagle evaluated spill scenarios if the pipeline is ruptured and potential damage and cleanup response? There is potential for large volumes of effluent to flood an extensive area over a short period of time in the event of a spill.</li> <li>▪ Impacts of proposals are significant from a cultural, environmental and socio-economic perspective and should not be approved as presented.</li> <li>▪ Pipeline should never be approved because of detrimental impact to caribou migration and potential for pollution of Melvin Bay marine environment.</li> </ul>
<b>L Tasseor</b>	<ul style="list-style-type: none"> <li>▪ Concern that the caribou migration route will be blocked and that the land is damaged by the twin pipeline. Does not want the project to go ahead.</li> <li>▪ Concern with who will clean up the mine at closure. Could what is being disposed be shipped south for disposal and proper storage?</li> </ul>
<b>K Zawadski</b>	<ul style="list-style-type: none"> <li>▪ Major and significant modification to the original project. Proposed increased discharge volume is more than tenfold the original project and therefore not fair to amend the original proposal based on the previous assessment by NIRB or other regulatory bodies.</li> <li>▪ Concerns of what is in the saline effluent and detrimental impact to marine ecosystem.</li> <li>▪ Pipeline would significantly impact caribou migration and other wildlife.</li> <li>▪ Proposed amendments need to be re-assessed and not be approved without a proper impact assessment with community input/involvement.</li> </ul>
<b>S Shirley</b>	<ul style="list-style-type: none"> <li>▪ Concern of impacts to water quality, mussels, seals, and marine environment as result of discharge to the relatively closed and small bay. Emphasised importance of the area to local people for traditional land use and harvesting.</li> <li>▪ Concern that previous guidelines/examples of this type of wastewater disposal do not exist to inform the process. Convenience and economic benefits cannot replace the natural gift of using the area.</li> </ul>