



NIRB File No.: 11MN034
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June 15, 2020

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

Sent via email: jamie.quesnel@agnicoeagle.com

Re: Guidance for Impact Statement Addendum Regarding Agnico Eagle Mines Limited's "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine, Nunavut" Project Proposal

Dear Jamie Quesnel:

As noted in correspondence dated June 9, 2020, the Nunavut Impact Review Board (NIRB or Board) concluded that Agnico Eagle Mines Limited's (Agnico Eagle, or Proponent) "Saline Effluent Discharge to Marine Environment"¹ Project Proposal constitutes a significant modification to the previously-approved Meliadine Gold Mine Project as well as the 2018 Saline Effluent Discharge Proposal² (NIRB File No. 11MN034). Further, the Board noted that the Saline Effluent Discharge to Marine Environment Proposal is integrally linked to the original project and activities approved in the 2018 Saline Effluent Discharge Proposal; therefore, 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, Amendment 001 may be necessary. Consequently, the Board initiated a formal reconsideration of the terms and conditions of Project Certificate No. 006 in accordance with Article 12, Section 12.8.2 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and with s. 112 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14 (*NuPPAA*).

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

² 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.

As with the NIRB's previous assessments of the Meliadine Gold Mine Project and the 2018 Saline Effluent Discharge Proposal, the Board remains committed to fulfilling its mandate to conduct a thorough, efficient and timely assessment of proposed works, activities and undertakings as required under the Nunavut Agreement and the legislative requirements of the NuPPAA. To that end, the NIRB will work with Agnico Eagle, regulators and other interested parties to: co-ordinate the NIRB's assessment requirements with other regulatory processes; ensure that information submitted previously is fully and properly considered; and build upon the previous assessments as appropriate.

This correspondence is intended to provide further guidance to Agnico Eagle regarding the specific information requirements expected to be addressed in the submission of an addendum to the Meliadine Gold Mine Project Final Environmental Impact Statement and additional addendum submitted for the 2018 Saline Effluent Discharge Proposal. To facilitate the NIRB's assessment of the potential ecosystemic and socio-economic impacts associated with the current Saline Effluent Discharge to Marine Environment Proposal, Agnico Eagle will be required to update its April 7, 2020 submission to allow the NIRB to scope the project as well as meet the requirements of the guidelines set out in [Appendix A](#) of this correspondence. While the NIRB recognizes that certain information may be present in Agnico Eagle's initial submission, this direction is meant to be comprehensive to assist Agnico Eagle in producing a complete Impact Statement (IS) Addendum that describes all aspects of the project proposal, including updates to relevant baseline data, alternatives and cumulative effects assessments, impact predictions, proposed mitigation measures and monitoring plans, and proposed community engagement. The IS Addendum should be prepared as a stand-alone document capable of supporting an Intervenor and public review, comment and assessment process, and must demonstrate compliance with the relevant requirements set out in the NIRB's EIS Guidelines as issued to Agnico Eagle for the Meliadine Gold Mine Project³ on February 20, 2012.

Following receipt of Agnico Eagle's IS Addendum, the NIRB will conduct an internal check to confirm the submission contains the necessary components, in a format that allows parties to access the content, so as to fulfill the requirements of the NIRB direction. Following acceptance of the Proponent's IS Addendum, the Board will initiate a public technical review of the proposal and will provide additional details regarding the associated assessment process and timelines at that time.

In closing, the NIRB requests that Agnico Eagle review the enclosed appendix and provide a date for the anticipated submission of its IS Addendum to the NIRB by **June 23, 2020**.

³ Guidelines for the Preparation of an Environmental Impact Statement for Agnico-Eagle Mines Ltd.'s Meliadine Project (NIRB File No. 11MN034). Issued by the Nunavut Impact Review Board, February 20, 2012 [Public Registry Id.: 286775].

Should you have any questions or require further clarification, please contact the undersigned directly via email at sgranchinho@nirb.ca or Erin Reimer, Technical Advisor I, via email at ereimer@nirb.ca.

Sincerely,



Sophia Granchinho
Manager, Impact Assessment
Nunavut Impact Review Board

Enclosure (1): Appendix A: Guidelines for the Completion of the IS Addendum for Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal

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:
**GUIDELINES FOR THE COMPLETION OF THE IS ADDENDUM FOR AGNICO EAGLE’S SALINE
EFFLUENT DISCHARGE TO MARINE ENVIRONMENT PROPOSAL**

The following information is requested in the submission of an addendum to the Meliadine Gold Mine Project Final Environmental Impact Statement and previous addendum for the 2018 Saline Effluent Discharge Proposal for Agnico Eagle Mines Limited’s (Agnico Eagle, or Proponent) “Saline Effluent Discharge to Marine Environment, Rankin Inlet, Rankin Inlet, Meliadine Gold Mine, Nunavut” Project Proposal (the Saline Effluent Discharge to Marine Environment Proposal). The information requested in this appendix does not limit the information Agnico Eagle should submit, and Agnico Eagle is advised to review the Environmental Impact Statement Guidelines (EIS Guidelines) for the Meliadine Gold Mine Project⁴ to ensure all relevant information is provided for the Saline Effluent Discharge to Marine Environment Proposal and that, at a minimum, the Impact Statement Addendum (IS Addendum) contains the information as outlined Article 12, Section 12.5.2 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* and s. 101(3) of the *Nunavut Planning and Project Assessment Act*. The NIRB acknowledges that Agnico Eagle’s April 7, 2020 application included a document entitled “Meliadine Gold Mine – Final Environmental Impact Statement Addendum, Environmental Assessment of Treated Groundwater Effluent Discharge into Marine Environment, Rankin Inlet”,⁵ which may or may not contain components of the information requirements listed below. However, the NIRB is providing the complete list of identified information requirements at this time, in order to facilitate a complete IS Addendum submission that will allow the NIRB to conduct a fulsome internal review and support the next steps in the assessment of the project proposal.

Agnico Eagle should provide within the IS Addendum a ‘Table of Concordance’ that cross references the information presented in the IS Addendum (document, section, and page number) with the information requirements identified in the EIS Guidelines – the NIRB has made efforts to identify the following specific information requirements pertaining to the EIS Guidelines which appear to be applicable:

- Executive and Popular Summaries and associated translations (EIS Guidelines, sections 4.6.1, 4.6.2, and 4.7).
- Rationale for the project with a clear description of need for and purpose of the project proposal, regulatory regime and land tenure (EIS Guidelines, section 5.2, 5.4, and 5.5); and specifically rationale why the previous commitments 13 and 20 made by Agnico Eagle during the assessment of the 2018 Saline Effluent Discharge Proposal were unachievable.
- Description of Saline Effluent Discharge to Marine Environment Proposal including detailed project design, and timelines. The Proponent should make efforts to provide overall context of the project proposal, via illustration and visualization of project components, where possible, to assist parties and community members in understanding of

⁴ Guidelines for the Preparation of an Environmental Impact Statement for Agnico-Eagle Mines Ltd.’s Meliadine Project (NIRB File No. 11MN034). Issued by the Nunavut Impact Review Board, February 20, 2012. [Public Registry ID: 286775].

⁵ Public Registry ID: 329232 and 329233

the scale and scope of the proposed modifications (EIS Guidelines, section 6.1, 6.2, 6.3, and 6.6).

- Description on how a conservative or precautionary approach has been taken (EIS Guidelines, section 2.4).
- Alternatives Assessment (EIS Guidelines, section 6.4) that considers all alternative means of carrying out the project proposal, including a “no-go” alternative, and the identification and application of criteria used to determine the technical feasibility and economic viability of the alternatives to the project proposal. The analysis must be done to a level of detail which allows parties to compare the project proposal with the alternatives in terms of the economic and environmental costs, as well as the social and economic impacts and/or benefits. In addition to these general requirements, the alternatives assessment should specifically include alternative options for:
 - construction activities (timing and process) considering the August 2020 dates clarified through the initial consideration of the application is not achievable;
 - rate of discharge and volume of saline effluent proposed to be discharged to the marine environment;
 - method of transportation of saline effluent (e.g. trucking, waterline);
 - design of project components (e.g. waterline, diffuser, installation methods, routing and location, waterbody and road crossings, traditional land use crossings);
- Charts, diagrams, tables, maps, and photographs to clarify the text as appropriate (EIS Guidelines, section 4.5).
- Drawings that clearly convey the various components of the project proposal (EIS Guidelines, section 4.5).
- Maps presented in a consistent and clearly identified datum and at appropriate and clearly identified scales to allow for comparison and overlay of mapped features (EIS Guidelines, section 4.5).
- Identification of spatial and temporal boundaries for this project proposal (EIS Guidelines, section 7.5).
- A summary of public consultation conducted with affected communities, residents, Inuit Organizations, Indigenous groups, and other governments or other organizations. The summary should include the issues raised and the Proponent's responses (EIS Guidelines, section 7.1).
- A summary of Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional and Community Knowledge collected with respect to the current proposal and a clear description on how it was incorporated within the proposal (EIS Guidelines, section 7.2).
- Identification of those valued ecosystemic components and valued socio-economic components [collectively referred to as valued components (VCs)], that are likely to be affected by the proposed project, including a description of how the VCs were selected and what methods were used to predict and assess the adverse and/or beneficial effects of the Project on these components (EIS Guidelines, section 7.6).
- Summary of environmental effects assessment for each VC expected to interact with the proposed project including the following:

- Description of the baseline by incorporating the latest available monitoring data (EIS Guidelines, sections 7.3, 7.4, 8.1 and 8.2);
- Anticipated changes to the environment;
- Anticipated effects (i.e., potential interactions) (EIS Guidelines, sections 7.8, 7.9 8.1 and 8.2):
 - Indicate explicitly what potential effects were or were not previously assessed
 - Identify the indicators (measures) and criteria used to assess impacts for each VC (EIS Guidelines, section 7.13)
 - Update all models as required for this proposal (e.g., noise and air quality modelling)
- Mitigation measures (EIS Guidelines, sections 8.1, 8.2 and 8.4);
- Identification and classification of residual effects for each VC, clearly indicating for each residual effect identified (EIS Guidelines, sections 7.14 and 9.8):
 - Probability of effect
 - Direction or nature of impact (i.e., positive/beneficial versus negative/adverse)
 - Magnitude and complexity of effect
 - Geographic extent of effect
 - Frequency and/or duration of effect
 - Reversibility or irreversibility of effect
- Determination of significance for each residual effect.
- Where applicable, link back to the predictions made in the FEIS or FEIS Addendum (2018) for each VC and indicate what, if any, changes are predicted in terms of potential effects, residual effects, and significance determination.
- Impacts of the environment on the project (e.g., geotechnical hazards, severe weather events such as higher than anticipated precipitation, etc.) (EIS Guidelines, section 7.10).
- Cumulative Effects Assessment for each VC (EIS Guidelines, section 7.11).
- Identify any uncertainties or limitations in the effects assessment (EIS Guidelines, section 7.15).
- Human Health and Environmental Risk Assessment (EIS Guidelines, section 8.3).
- Accident and Malfunctions Assessment (EIS Guidelines, section 8.4).
- Stand-alone management and monitoring plans with details such as monitoring methodology (including parameters to be measured), approximate sampling locations (provide a map), and monitoring frequency and duration. As well these plans should include thresholds/triggers for adaptive management and mechanism to evaluate the effectiveness of the proposed mitigation measures and adaptive management strategies. Further, the following management plans shall be included/updated to incorporate the Saline Effluent Discharge to Marine Environment Proposal (EIS Guidelines, sections 9.3 and 9.4):
 - Air Quality Monitoring Plan
 - Marine Environmental Management Plan (Appendix D of the Shipping Management Plan)
 - Groundwater Management Plan

- Water Management Plan
- Water Quality and Flow Monitoring Plan
- Noise Abatement and Monitoring Plan
- Sediment and Erosion Management Plan
- Roads Management Plan
- Dust Management Plan
- Greenhouse Gas Reduction Plan
- Terrestrial Environment Management and Monitoring Plan
- Ocean Discharge Monitoring Plan
- Risk Management and Emergency Response Plan
- Spill Contingency Plan
- Interim Closure and Reclamation Plan
- And any other plans that are associated with the project proposal

Several community and regional organizations as well as individuals submitted comments on the proposal, and the NIRB would expect that Agnico Eagle consider this feedback not only in determining content and priority of items to be described in the public consultation section, but also when considering important discussion to include in each of the valued components discussed within the IS Addendum.