## NTI Presentation ᑐᙵᕕᒃᑯᑦ ᐅᓂᒃᑳᖓ

# For Nunavut Water Board's Public Hearing on Agnico Eagle Mines Ltd's Application to Amend its Type A Water Licence for Meliadine Mine

# ᓄᓇᕘᕐᒥ ᐃᒪᓕᕆᔩᑦ ᑲᑎᒪᔩᖏᑦ ᐃᓄᓕᒫᓂᒃ ᑲᑎᒪᑎᑦᑎᔪᑦ ᐋᒡᓃᑯ ᐄᒍᓪ ᐅᔭᕋᓐᓂᐊᑎᒃᑯᑦ ᓕᒥᑕᑦ ᑐᒃᓯᕋᐅᑎᖓᓂᒃ ᐋᖅᑭᒋᐊᖅᑕᐅᖁᓪᓗᒍ ᐃᒪᓕᕆᓂᕐᒧᑦ ᓇᓗᓇᐃᒃᑯᑕᖓᑦ A ᓚᐃᓴᑖᕈᒪᔾᔪᑎᖓᑦ ᒦᓕᐊᑕᐃᓐ ᐅᔭᕋᓐᓂᐊᕐᕕᒻᒧᑦ

September 11, 2024, Rankin Inlet
ᓰᑦᑏᕝᕙ 11, 2024, ᑲᖏᖅᖠᓂᖅ

# Role of Nunavut Tunngavik Incorporated (NTI)
# ᐱᓕᕆᐊᖃᕐᓂᖓ ᓄᓇᕗᑦ ᑐᙵᕕᒃ ᑎᒥᖓ (ᑐᙵᕕᒃ)

- NTI represents the Inuit of Nunavut for the purpose of ensuring that Inuit rights are fully respected, including:
  - Aboriginal rights such as the duty to consult under s. 35 of Canadian constitution; and
  - treaty rights, meaning Nunavut Agreement rights and obligations.
- NTI's role extends to ensuring that the processes of the Institutions of Public Government are in keeping with the Nunavut Agreement, the *Nunavut Waters and Surface Rights Tribunal Act* and uphold Inuit participation and consultation requirements.
- In this review process, NTI supports the Kivalliq Inuit Association (KivIA), the Kivalliq Wildlife Board (KWB), the Hunter and Trappers Organizations (HTOs) and communities generally in addressing issues that are of concern to all Inuit in Nunavut including the promotion of Inuit culture and the safeguarding of Nunavut's wildlife, environment, culture, lands and economy.

- ᑐᙵᕕᒃᑯᑦ ᑭᒡᒐᖅᑐᐃᔪᑦ ᐃᓄᖕᓂᒃ ᓄᓇᕗᒻᒥ ᐃᓄᐃᑦ ᐱᔪᓐᓇᐅᑎᖏᑦ ᐊᑐᖅᑕᐅᕙᔪᐊᖁᓪᓗᒋᑦ, ᐃᓚᒋᔭᐅᓗᑎᒃ:
  - ᓄᓇᖃᖅᑳᖅᓯᒪᔪᑦ ᐱᔪᓐᓇᐅᑎᖏᑦ ᓲᕐᓗ ᑐᓴᕐᕕᖃᕐᓂᖅ ᑎᑎᕋᖅᓯᒪᓂᖓᓂ s. 35 ᑲᓇᑕᒥ ᑐᙵᕕᔾᔪᐊᖓᓂ; ᐊᒻᒪᓗ
  - ᓄᓇᖃᖅᑳᖅᓯᒪᔪᑦ ᐱᔪᓐᓇᐅᑎᖏᑦ, ᑐᑭᖓ ᓄᓇᕗᒻᒥ ᐊᖏᕈᑎᓂ ᐱᔪᓐᓇᐅᑏᑦ ᐊᖏᕈᑕᐅᓯᒪᔪᓪᓗ.
- ᑐᙵᕕᒃᑯᑦ ᐱᓕᕆᐊᓖᑦ ᑎᑭᐅᑎᓯᒪᔪᒥᒃ ᓇᓗᓇᐃᕆᓯᒪᓂᕐᒥᒃ ᐊᐅᓚᓂᖏᑦ ᐊᖏᕈᑎᑎᒎᑦ ᑎᒥᙳᖅᑎᑕᐅᓯᒪᔪᑦ ᐊᙳᑎᓯᒪᑦᓯᐊᖁᓗᐊᒻᒪᖔᑕ ᓄᓇᕗᑦ ᐊᖏᕈᑎᖏᓐᓂᒃ, *ᓄᓇᕗᒻᒥ ᐃᒪᖏᑦ ᐊᒻᒪᓗ ᓄᓇᐅᑉ ᖄᖓᓃᕐᑐᑦ ᐱᔪᓐᓇᐅᑎᓕᕆᔨᒃᑯᑦ ᐱᖁᔭᖓᑦ* ᐊᒻᒪᓗ ᐊᔭᐅᖅᑐᐃᓗᑎᒃ ᐃᓄᐃᑦ ᐃᓚᒋᔭᐅᒋᐊᖃᕐᓂᖏᓐᓂᒃ ᐊᒻᒪᓗ ᑐᓴᕐᕕᐅᖃᑦᑕᓇᐊᖃᕐᓂᖏᓐᓂᒃ.
- ᑕᕝᕙᓂ ᕿᒥᕐᕈᓂᕐᒥ, ᑐᙵᕕᒃᑯᑦ ᐃᑲᔪᖅᓱᐃᔪᑦ ᑭᕙᓪᓕᖅ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒋᓐᓂᒃ (KivIA), ᑭᕙᓪᓕᖅ ᐆᒪᔪᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᖏᓐᓂ (KWB), ᓄᓇᓕᖕᓂ ᐊᙳᓇᓱᒃᑐᓕᕆᔨᓂᒃ (HTO) ᐊᒻᒪᓗ ᓄᓇᓕᖕᓂᒃ ᐋᖅᑭᒃᓱᐃᓇᓱᐊᖅᑎᓪᓗᒋᑦ ᐃᓱᒫᑕᐅᔪᓂᒃ ᐃᓄᖕᓄᑦ ᓄᓇᕗᒻᒥ ᐃᓚᒋᔭᐅᓪᓗᑎᒃ ᐱᕚᓪᓕᕈᑎᒃᓴᓂᒃ ᐃᓄᐃᑦ ᐃᓕᖅᑯᓯᖓᓄᑦ ᐊᑦᑕᓇᐃᖅᓯᒪᒍᑎᒃᓴᓂᓪᓗ ᓄᓇᕗᒻᒥ ᓂᕐᔪᑎᓄᑦ, ᐊᕙᑎᒧᑦ, ᐃᓕᖅᑯᓯᕐᒧᑦ, ᓄᓇᖓᓄᑦ ᒪᑭᒪᔾᔪᑎᖏᓐᓄᓪᓗ.

# NTI Supports Kivalliq Inuit Association’s Hearing Submissions

NTI supports KivIA’s Final Written Submissions and has additional comments on three of KivIA’s proposed amendments to AEM’s Meliadine Water Licence.

ᓄᓇᕘᑦ ᑐᙵᕕᒃᑯᑦ ᐃᑲᔪᖅᑐᐃᕗᑦ ᑭᕙᓪᓕᖅᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖅᑲᑎᒌᒃᑯᖕᒋᓐᓂᒃ ᑎᑎᕋᖅᑕᖕᒋᓐᓂᒃ ᑐᓂᓯᓂᐊᖅᑎᓪᓗᒋᑦ ᐊᒻᒪᓗ ᓱᓕᒃᑲᓐᓂᖅ ᐅᖃᐅᓯᒃᓴᑲᓐᓂᕐᓂᒃ ᐱᖓᓱᓂᒃ ᑭᕙᓪᓕᖅᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖅᑲᑎᒌᒃᑯᖕᒋᓐᓂᑦ ᑐᒃᓯᕋᐅᑎᒋᓯᒪᔭᖕᒋᓐᓂᒃ ᐋᖅᑭᒋᐊᖅᓯᒪᔪᓂᒃ ᐋᒡᓃᑯ ᐅᔭᕋᓐᓂᐊᑎᒃᑯᑦ ᐃᒥᕐᒧᑦ ᓚᐃᓴᖕᓯᓂᖅ.

# NTI Supports Kivalliq Inuit Association’s Hearing Submissions

**1. KivIA Comment 6**

NTI appreciates AEM’s new proposed commitment in the draft Water Licence (Part F, section 4) to limit the annual discharge of treated effluent into Meliadine Lake.

Similarly, NTI supports KivIA’s call for ***a new Licence term that AEM will under no circumstances discharge underground saline groundwater to Meliadine Lake.*** This AEM commitment to KivIA related to protecting water quality in Meliadine Lake is fundamental. It should be an explicit obligation in the NWB’s main authorization for Meliadine Mine. As a Licence term, it will be legally enforceable, less easily amended than a management plan commitment, and prominent for Inuit and the public to see.

**1. ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᑦ ᐅᖃᐅᓯᒃᓴᖓᑦ 6**

ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᖁᔭᓕᕗᑦ ᐋᓐᓃᑯ ᐅᔭᕋᓐᓂᐊᑎᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᖓᑦ ᓄᑖᖅ ᐱᓪᓗᒍ ᑐᓂᕿᑎᕆᓯᒪᓂᓇᔭᖓᓄᑦ ᐃᒥᕐᒧᑦ ᐱᐊᓂᒃᓯᒪᙱᑦᑐᖅ ᓚᐃᓴᖓᑦ (ᐃᓚᖓᑦ ᒥ, ᐊᒡᒍᖅᓯᒪᓂᖓ 4) ᒥᑭᓂᖅᓴᐅᑲᓐᓂᖁᓪᓗᒍ ᐊᕐᕌᒍᑕᒫᑦ ᑯᕕᑎᑦᑎᓂᓇᕙᑦᑕᖏᑦ ᐃᓚᐅᖅᓯᒪᔪᒥᒃ ᒥᓕᐊᑕᐃᓐ ᑕᓯᖓᓄᑦ.

ᐊᔾᔨᑲᓴᖓᓪᓗ, ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᐃᑲᔪᖅᑐᐃᕗᑦ ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᖏᓐᓂᒃ ᑐᒃᓯᕋᐅᑎᖓᓂᒃ **ᓄᑖᒥᒃ ᓚᐃᓴᒥᒃ ᐃᑯᓕᒡᕕᓕᒻᒥᒃ ᐋᓐᓃᑯᒃᑯᑦ ᐊᓯᖅᑯᖅᕕᖃᙱᑦᑐᒥᒃ ᑯᕕᑎᑦᑎᓂᐊᙱᓚᑦ ᑕᕆᐅᕐᒥᒃ ᐃᒪᕐᒥᒃ ᒥᓕᐊᑕᐃᓐ ᑕᓯᖓᓄᑦ.** ᑐᓂᕿᑎᕆᓯᒪᓂᖅ ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᓐᓄᑦ ᐋᓐᓃᑯ ᐅᔭᕋᓐᓂᐊᑎᒃᑯᑦ ᓴᐳᔾᔨᓂᐊᕐᒪᑕ ᐃᒪᐅᑉ ᐱᐅᓂᖓᓂᒃ ᒥᓕᐊᑕᐃᓐ ᑕᓯᖓᓄᑦ ᐱᒻᒪᕆᐅᕗᖅ. ᓇᓗᓇᐃᖅᓯᒪᑦᑎᐊᖅᑐᒥᒃ ᐱᓕᕆᐊᒃᓴᖃᕆᐊᖃᖅᑐᑦ ᓄᓇᕗᒥ ᐃᒪᕐᒥᐅᑕᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᖏᑎᒍᑦ ᐱᔪᓐᓇᑎᑦᑎᓂᕆᔭᖓᒍᑦ ᒥᓕᐊᑕᐃᓐ ᐅᔭᕋᓐᓂᐊᕐᕕᖓᓂ. ᓚᐃᓴᐅᓗᒍ ᐃᑯᓕᒡᕕᓕᒃ, ᒪᓕᒐᖅᑎᒍᑦ ᐊᑐᓕᖅᑎᑕᐅᔪᓐᓇᖅᑐᖅ, ᐋᖅᑭᒋᐊᖅᑕᐅᔪᓐᓇᓗᐊᙱᑦᑐᖅ ᐊᐅᓚᑕᐅᔪᒥᒃ ᐸᕐᓇᑕᐅᓯᒪᔪᒥᒃ, ᐊᒻᒪᓗ ᐅᔾᔨᕐᓇᕐᓂᖅᓴᖅ ᐃᓄᓐᓄᑦ ᑭᒃᑯᑐᐃᓐᓇᕐᓄᓪᓗ ᑕᑯᔭᐅᔪᓐᓇᕐᓗᓂ.

# NTI Supports Kivalliq Inuit Association’s Hearing Submissions

**2. KivIA Comment 7 re Draft Water Licence Part B, section 10**

NTI shares KivIA’s concern that under AEM’s new proposed wording for Part B, s. 10, a management plan could be deemed approved despite Inuit or others having expressed legitimate, unresolved concerns with the Plan.

Therefore, NTI urges the NWB not to accept the wording AEM proposed in June 2024 or in its Final Submission. The Water Licence’s original wording should continue.

**2. ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᑦ ᑐᓂᕐᕈᑎᒋᓯᒪᓂᕆᔭᖓᑦ 7 ᐱᓪᓗᒍ ᐱᐊᓂᒃᓯᒪᙱᑦᑐᖅ ᐃᒥᕐᒧᑦ ᓚᐃᓴᖓ ᐃᓚᖓ ᐱ, ᐊᑲᙳᖅᓯᒪᓂᖓ 10**

ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᑲᑐᔾᔨᖃᑎᖃᖅᐳᑦ ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᑦ ᐃᓱᒫᓗᑎᖓᓂᒃ ᐊᑖᓂ ᐊᑲᓃᑯᒃᑯᑦ ᐅᔾᕋᓐᓂᐊᑎᒃᑯᑦ ᓄᑖᒥᒃ ᑐᒃᓯᕋᐅᑎᖓᓂᒃ ᐅᖃᐅᓯᖅᑕᖏᓐᓂᒃ ᐃᓚᖓᑦ ᐱ, ᐊᑲᙳᖅᓯᒪᐋᑦ 10, ᐊᐅᓚᑦᑎᓂᕐᒧᑦ ᐸᕐᓇᐅᑎᖓ ᐊᖏᖅᑕᐅᑐᐃᓐᓇᕆᐊᖃᖅᐳᖅ ᐃᓄᐃᑦ ᐊᓯᖏᓪᓗ ᐃᓱᒫᓗᑎᖃᕋᓗᐊᖅᑎᓪᓗᒋᑦ ᓇᓛᒃᖅᑐᓂᒃ, ᐋᖅᑭᒃᑕᐅᕋᓂᒃᓯᒪᙱᑦᑐᓂᒃ ᐃᓱᒫᓘᑎᓂᒃ ᐸᕐᓇᐅᑎᒧᑦ.

ᑕᐃᒪᐃᒻᒪᑦ, ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᑲᔪᖏᖅᓴᐃᕗᑦ ᓄᓇᕗᑦ ᐃᒪᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᙶᓂᒃ ᐊᖏᕐᑯᓇᖏᑦ ᐅᖃᐅᓯᖅᑕᖏᓐᓂᒃ ᐋᒡᓃᑯ ᐅᔾᕋᓐᓂᐊᑎᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᖓᓂᒃ ᔫᓂ 2024 ᐅᑉᓗᓗ ᑭᖑᓪᓕᖅᐹᒥᒃ ᑐᒃᓯᕋᐅᑎᖓᓂᒃ. ᐃᒪᕐᒧᑦ ᓚᐃᓴᖏᑦ ᐅᖃᐅᓯᖅᑕᖓᑦ ᑲᔪᓯᔾᔭᐊᖃᖅᑐᖅ.

# NTI Supports Kivalliq Inuit Association's Hearing Submissions

**3. KivIA Comment 7 re Draft Water Licence Part C, section 7**

NTI agrees that the Water Licence should require AEM to file an updated cost estimate for reclamation along with its Final Reclamation and Closure Plan and therefore supports KivIA's proposed amendment to the existing s.7 in Part C of the Water Licence.

At the same time, NTI sees value in AEM's proposed new section 7 whereby the NWB, Licensee, the Crown and/or KivIA could review the liability reclamation requirements and seek to revise the amount of security that AEM must hold in light of changed circumstances. Should the costs of security increase significantly, revising AEM's legal obligations in a timely way confirms that the proponent is positioned to meet all their closure obligations.

Therefore, NTI recommends including in the amended Water Licence both the current Part C s. 7 as edited by KivIA as well as AEM's proposed new term.

**3. ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᑦ ᐅᖃᐅᓯᖓᑦ 7 ᐱᐊᓂᒃᓯᒪᙱᑦᑐᖅ ᐃᒥᖅᒧᑦ ᓚᐃᓴᖓᑦ ᐃᓚᖓᑦ ᑎ, ᐊᒡᒍᖅᓯᒪᔪᖅ 7**

ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᐊᖏᖃᑎᓖᑦ ᐃᒥᖅᒧᑦ ᓚᐃᓴᖓᑦ ᐱᑕᖃᕆᐊᖃᖅᒪᑦ ᐋᒡᓃᒍ ᐅᔾᕋᓐᓂᐊᖅᕕᒃ ᓄᑖᕈᑎᑦᑎᔾᔪᕆᐊᖃᖅᒪᑕ ᐊᑭᑦᓴᔾᙶᐊᖅᑕᖓᑕ ᐅᑎᖅᑎᑕᐅᔫᓴᐅᓗᓂ ᐊᒻᒪᓗ ᑭᖑᓪᓕᖅᐹᒥᒃ ᐅᑎᖅᑎᑕᐅᔫᓴᒥᒃ ᒪᑐᔾᔪᐅᓗᓂᓗ ᐸᖕᓇᐅᑎᖓᑦ ᐊᒻᒪᓗ ᑕᐃᒪᐃᒻᒪᑦ ᐃᑲᔪᖅᑐᐃᕗᑦ ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᒋᓯᒪᔾᔮᓂᒃ ᐋᖅᑭᒋᐊᖅᑕᐅᓗᓂ ᐅᓪᓗᒥ ᐊᑐᖅᑕᐅᔪᒥᒃ ᐊᒡᒍᖅᓯᒪᔪᖅ 7 ᐃᓚᖓᑦ ᙳᑭ ᐃᒥᖅᒧᑦ ᓚᐃᓴᐅᔪᒥᒃ.

ᑖᒃᑯᓂᖓᒃᓴᐃᓐᓇᖅ, ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᑕᑯᕗᑦ ᐊᑑᑎᖃᕐᓂᖓᓂᒃ ᐋᒡᓃᒍ ᐅᔾᕋᕐᓂᐊᖅᑎᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᖓᓂᒃ ᓄᑖᖑᔪᖅ ᐊᒡᒍᖅᓯᒪᔪᖅ 7 ᑖᒃᑯᐊ ᓄᓇᕗᒥ ᐃᒪᓕᕆᓂᕐᒧᑦ ᑲᑎᒪᔨᖏᑦ, ᓚᐃᓴᖅᑎᑦᑎᔩᑦ, ᑲᓇᑕᐅᑉ ᒐᕙᒪᑐᖃᒃᑯᑦᖏᑦ ᐊᒻᒪᓗ\ᐅᒡᕙᓗ ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᖏᑦ ᕿᒥᕐᕈᔪᓐᓇᖅᒪᑕ ᐊᑭᓕᕆᐊᓖᑦ ᐅᑎᖅᑎᑕᐅᓂᖏᓐᓄᑦ ᐊᑐᖅᑕᐅᔭᕆᐊᓖᑦ ᐊᒻᒪᓗ ᓄᑖᕈᑎᑦᑎᔪᒪᓗᑎᒃ ᐅᓄᕐᓂᖏᑦ ᐱᔭᐅᔾᔭᐃᖅᓯᒪᓂᐅᑉ ᐋᒡᓃᒍᒃᑯᑦ ᐅᔾᕋᓐᓂᐊᕕᒃᑯᑦ ᑎᒍᒥᐊᕆᐊᖃᖅᒪᑕ ᐊᓯᔾᔨᖅᑕᐅᓯᒪᓕᖅᑎᓪᓗᒋᑦ. ᐊᑭᖓ ᐱᔭᐅᔾᔭᐃᖅᓯᒪᓂᐅᑉ ᐊᖏᓪᓕᑲᓐᓂᕆᐊᖃᕐᓂᐊᕈᓂ ᐊᖏᔫᒥᒃ, ᓄᑖᕈᑎᑦᑎᔾᔪᕆᐊᖃᖅᐳᑉ ᐋᒡᓃᒍ ᐅᔾᕋᓐᓂᐊᑎᒃᑯᑦ ᒪᓕᒐᑎᒍᑦ. ᒪᓕᑦᑕᕆᐊᓕᖏᓐᓂᒃ ᐱᐊᓂᒃᓯᒪᔾᔪᕆᐊᖃᖅᕕᒋᔭᖏᑎᒍᑦ ᓇᓗᓇᐃᖅᓯᕗᓪᓗ ᐃᓕᓯᒪᑦᑎᐊᒻᒪᕆᓐᓂᐊᕐᒪᑦ ᐊᑐᖁᔭᐅᔪᑦ ᐊᑐᑦᑎᐊᕈᓂᒋᑦ.

ᑕᐃᒪᐃᒻᒪᑦ , ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᐊᑐᖁᔨᕗᑦ ᐱᖃᓯᐅᑎᓗᑎᒃ ᐋᖅᑭᒋᐊᖅᓯᒪᔪᖅ ᐃᒥᖅᒧᑦ ᓚᐃᓴᐅᔪᖅ ᑕᒪᒃᑆᓄᑦ ᐊᑐᖅᑐᖅ ᐃᓚᖓᑦ ᑎ ᐊᒡᒍᖅᓯᒪᔪᖅ 7 ᐋᖅᑭᒋᐊᖅᓯᒪᑎᓪᓗᒍ ᑭᕙᓪᓕᕐᒥ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᖏᓐᓄᑦ ᐊᒻᒪᓗ ᐋᒡᓃᒍ ᐅᔾᕋᓐᓂᐊᑎᒃᑯᓐᓄᑦ ᑐᒃᓯᕋᐅᑎᖓ ᓄᑖᖅ ᐃᓱᓕᕝᕕᓕᒃ.

# NTI Comments on CIRNA, DFO and ECCC Submissions

- The outstanding technical comments raised by the Department of Fisheries and Oceans (DFO) and Environment and Climate Change Canada (ECCC) as well as the comments on security by Crown Indigenous Relations and Northern Affairs (CIRNA) all relate to environmental protection and, by extension, to the long-term ability of Inuit to meaningfully harvest and enjoy the land and waters affected by the Meliadine Mine.
- NTI agrees with CIRNA's proposal to update the NWB on the issue of security before and at the public hearing. CIRNA, KivIA and AEM should all provide this update.

- ᑭᖑᕙᖅᓯᒪᔪᑦ ᐅᖃᐅᓲᑦ ᓴᖅᑭᑕᐅᓯᒪᔪᑦ ᐃᒪᕐᒥᐅᑕᓕᕆᔨᒃᑯᓐᓄᑦ ᐊᒻᒪᓗ ᐊᕙᑎᓕᕆᔨᒃᑯᓐᓄᑦ ᓯᓚ ᐊᓯᔾᔨᐸᓪᓕᐊᓂᖓ ᑲᓇᑕᒥ ᐊᒻᒪᓗ ᐱᖃᓯᐅᑎᔪᖅ ᐅᖃᐅᓯᐅᓯᒪᔪᑦ ᐅᐊᑦᑎᔭᐅᑦᑎᐊᕆᐊᖃᕐᓂᖓ ᑯᐃᓐ ᑭᒡᒐᖅᑎᖏᑦ ᓄᓇᖃᖅᑳᖅᓯᒪᔪᓕᕆᓂᖅ ᐊᒻᒪᓗ ᐃᓄᓕᕆᔨᑐᖃᒃᑯᑦ ᑕᒪᕐᒥᒃ ᑐᑭᓯᒻᒪᑕ ᐊᕙᑎᒥᒃ ᓴᐳᒻᒥᑦᑎᔭᕆᐊᖃᕐᓂᕐᒥᒃ ᐊᒻᒪᓗ, ᐃᓚᔭᐅᓗᓂ, ᐊᑯᓐᓂᖅᑐᒥᒃ ᐱᔪᓐᓇᕐᑯᓪᓗᒋᑦ ᐃᓄᐃᑦ ᐆᒪᔪᖅᓯᐅᖃᑦᑕᕐᑯᓗᒋᑦ ᑐᑭᖃᑦᑎᐊᖅᑐᒥᒃ ᐊᒻᒪᓗ ᕐᑯᕕᐊᕆᔭᖃᕐᓗᑎᒃ ᓄᓇᒥᒃ ᐊᒻᒪᓗ ᐃᒪᕐᒥᒃ ᐊᑦᑐᖅᑕᐅᓯᒪᔪᓄᑦ ᒥᓕᐊᑕᐃᓐ ᐅᔭᕋᓐᓂᐊᑎᒃᑯᓐᓄᑦ.
- ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᐊᖏᖃᑎᓖᑦ ᑯᐃᓐ ᑭᒡᒐᖅᑎᖏᓐᓂᒃ ᓄᓇᖃᖅᑳᖅᓯᒪᔪᓕᕆᓂᖅ ᐊᒻᒪᓗ ᐃᓄᓕᕆᔨᑐᖃᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᖏᓐᓂᒃ ᓄᑖᕈᖅᑎᑕᐅᔭᕆᐊᖃᕐᓂᖏᓐᓂᒃ ᓄᓇᕗᒥ ᐃᒪᓕᕆᓂᕐᒧᑦ ᑲᑎᒪᔨᖏᓐᓂᒃ ᐅᖃᐅᑕᐅᑎᓪᓗᒍ ᐱᔾᔭᐃᖅᓯᒪᔭᕆᐊᖃᕐᓂᖏᑦ ᓯᕗᓂᐊᒍᑦ ᐊᒻᒪᓗ ᐃᓄᓕᒫᖅᑎᑦᑎᓂᕐᒥᒃ ᑲᑎᒪᓂᕐᒥᒃ ᓈᓚᓐᓂᖃᖅᑎᑦᑎᑎᓪᓗᑎᒃ. ᑯᐃᓐ ᑭᒡᒐᖅᑎᖏᑦ ᓄᓇᖃᖅᑳᖅᓯᒪᔪᓕᕆᓂᖅ ᐊᒻᒪᓗ ᐃᓄᓕᕆᔨᑐᖃᒃᑯᑦ, ᑭᕙᓪᓕᕐᒥ ᑲᑐᔾᔨᖃᑎᒌᒃᑯᖏᑦ ᐊᒻᒪᓗ ᐋᒡᓃᑯ ᐅᔭᕋᓐᓂᐊᑎᒃᑯᑦ ᑕᒪᒃᑯᓂᖓᓕᒫᖅ ᑐᓂᓯᔭᕆᐊᖃᖅᐳᑦ ᓄᑖᕈᖅᑎᓯᒪᔪᒥᒃ.

# NTI Comments on CIRNA, DFO and ECCC Submissions

**1. Draft Water Licence Part E section 2**

NTI shares DFO and ECCC's concerns with AEM's proposal to more than double the authorized volume of water that AEM may take from Meliadine Lake to flood the pits upon closure of Meliadine Mine, from 4 to 8.7 million cubic metres.

An authorized volume should be based on reliable predictions about what amount of water is needed to reflood the pits and how much volume can be withdrawn without jeopardizing the quality of Meliadine Lake's aquatic environment.

NTI recommends that planning for this aspect of the Meliadine Mine's closure happen as soon as possible and in time for AEM to adjust its operations if it turns out that the volume of water needed would compromise the aquatic environment in Meliadine Lake. It would be unacceptable to Inuit to discover that the plan to draw water from Meliadine Lake jeopardizes the lake's health and that there is no sound alternative to complete the closure of the Mine.

**1. ᐱᓴᕇᖅᓯᒪᙱᑦᑐᖅ ᐃᒥᕐᒧᑦ ᓚᐃᓵᙶᑦ ᐃᓚᙶᑦ ᒋ ᐋᒍᖅᓯᒪᔪᖅ 2**

ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᐃᑲᔪᖅᓱᐃᕗᑦ ᐃᒪᕐᒥᐅᑕᓕᕆᔨᒃᑯᓐᓂᒃ ᐊᒻᒪᓗ ECCC-ᑯᒃ ᐃᓱᒫᓘᑎᖏᓐᓂᒃ ᐋᒡᓃᑯ ᐅᓴᕋᓐᓂᐊᑎᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᖔᓐᓂᒃ ᒪᕿᐊᖅᑎᓗᐊᖅᓯᒪᒻᒪᑦ ᐱᔪᓐᓇᖅᑎᑕᐅᓯᒪᓂᕆᓴᖏᑦ ᐃᒥᕐᒥᒃ ᐋᒡᓃᑯ ᐅᓴᕋᓐᓂᐊᑎᒃᑯᑦ ᐱᔪᓐᓇᕐᒪᖔᑕ ᒥᓕᐊᑕᐃᓐ ᑕᓯᖕᓂᑦ ᑕᑕᓕᕐᑯᓪᓗᒍ ᐃᓗᑦᑐᖅᑎᓯᒪᔪᑦ ᐃᒻᒪᓪᓗᒋᑦ ᒪᑐᓴᐅᒍᓂ ᒥᓕᐊᑕᐃᓐ ᐅᓴᕋᓐᓂᐊᕐᕕᒃ, ᐅᕙᙵᑦ 4-ᒥᒃ ᐅᕗᖓ 8.7-ᒧᑦ ᒥᓕᐊᓐ ᐆᑦᑑᑏᑦ ᒦᑕᓄᑦ.

ᐱᔪᓐᓇᖅᑎᑕᐅᔪᖅ ᐅᕐᑯᒪᐃᓐᓂᖓ ᐊᑐᖅᑕᐅᓴᕆᐊᖃᕋᓗᐊᕐᒪᑦ ᐃᓱᒪᒋᓴᐅᓯᒪᔪᓄᑦ ᖃᓄᑎᒋ ᐃᒥᕐᒥᒃ ᐱᓴᕆᐊᖃᕐᒪᖔᑕ ᐃᒻᒪᒃᑕᐅᑲᓐᓂᕐᑯᓪᓗᒋᑦ ᐊᒻᒪᓗ ᖃᓄᑎᒋ ᐅᕐᑯᒪᐃᓐᓂᓕᒻᒥᒃ ᐃᒪᐃᓴᐃᔪᓐᓇᕐᒪᖔᑕ ᓱᕋᐃᙱᓪᓗᑎᒃ ᐱᐅᓂᖓᓂᒃ ᒥᓕᐊᑕᐃᓐ ᑕᓯᖓᑕ ᐃᒪᖃᕐᕕᖓᑕ ᐊᕙᑎᖓᓂᒃ.

ᓄᓇᕗᑦ ᑐᙵᕕᒃᑯᑦ ᐱᕐᑯᕝᕗᑦ ᐸᕐᓇᓯᒪᕐᑯᕝᓪᓗᑎᒃ ᑕᒪᓐᓇ ᐱᓪᓗᒍ ᒥᓕᐊᑕᐃᓐ ᐅᓴᕋᓐᓂᐊᕐᕕᒃᑯᑦ ᒪᑐᓴᐅᑦᑕᐅᑎᕆᕐᑯᓪᓗᒍ ᓈᒻᒪᓈᕐᓗᓂᓗ ᐋᒡᓃᑯ ᐅᓴᕋᓐᓂᐊᑎᒃᑯᑦ ᐋᖅᑭᒋᐊᖅᑎᓇᑎᓪᓗᒋᑦ ᐊᐅᓚᓂᖏᓐᓂᒃ ᐃᒥᖓ ᐅᕐᑯᒪᐃᓐᓂᖓ ᐱᓴᕆᐊᖃᕈᓂ ᐊᖏᖃᑎᑮᒃᑲᓴᖅᑐᑦ ᐃᒪᓕᕆᓂᐅᑉ ᐊᕙᑎᖓᓂᑦ ᒥᓕᐊᑕᐃᓐ ᑕᓯᖓᓂᑦ. ᓈᒻᒪᒃᑲᓴᙱᒻᒪᕆᒻᒪᑦ ᐃᓄᓐᓄᑦ ᖃᐅᔨᓴᐅᒍᑎ ᐸᕐᓇᑦᑐᖃᕐᓂᐊᕈᓂ ᐃᒥᖅᑕᖅᕕᐅᓂᐊᕈᓂ ᒥᓕᐊᑕᐃᓐ ᑕᓯᖓᓂᑦ ᐊᑦᑕᓇᕈᑕᐅᕗᖅ ᑕᓯᕐᓄᑦ ᖃᓄᐃᙱᑦᑎᐊᕈᓯᕐᒧᑦ ᐊᒻᒪᓗ ᐊᓯᐊᒎᖅᕕᖃᕐᔾᔭᖓᓂ ᒪᑐᓴᐅᓂᐊᕐᓂᖔᓂᒃ ᐅᓴᕋᓐᓂᐊᖅᕕᐅᑉ.

# NTI Comments on CIRNA, DFO and ECCC Submissions

**2. ECCC Comment 19 – Closure Criteria for Surface Water Quality**

NTI supports ECCC's recommendation that water quality criteria for closure of Meliadine Mine in AEM's Interim Closure and Reclamation Plan be protective of aquatic life for all waterbodies if, as ECCC predicts, all the waterbodies will be reconnected to the regional surface water network post closure and fish will eventually populate all these waterbodies.

Fishing edible and healthy fish is essential to the Inuit way of life. Post closure, water must be safe for fish and Inuit.

**2. ECCC-ᑯᑦ ᐅᖃᐅᓯᖓᑦ 19 - ᒪᑐᔭᐅᓂᐊᖅᐸᑦ ᐊᑐᖅᑕᐅᔭᕆᐊᓖᑦ ᓄᓇᐅᑉ ᖄᖓᓂ ᐃᒪᐅᑉ ᖃᓄᐃᓐᓂᖓ**

ᓄᓇᕗᑦ ᑐᒥᕝᕕᒃᑯᑦ ᐃᑲᔪᖅᑐᐃᕗᑦ ECCC-ᑯᑦ ᐊᑐᖅᑕᐅᖁᔭᖓᓂᒃ ᐃᒥᐅᑉ ᐱᐅᓂᖓᓄᑦ ᒪᓕᒋᐊᓕᒃ ᒪᑐᔭᐅᑎᓪᓗᒍ ᒥᓕᐊᑕᐃᓐ ᐅᔭᕋᓐᓂᐊᕐᕕᐅᑉ ᐋᒃᓃᑯ ᐅᔭᕋᓐᓂᐊᕐᕕᐅᑉ ᒪᑐᔭᐅᓚᐅᑲᓐᓂᖓ ᐊᒻᒪᓗ ᐅᑎᖅᑎᑦᑎᓂᖓ ᐸᕐᓇᐅᑎᖓ ᓴᐳᔾᔨᖁᓪᓗᒍ ᐃᒪᕐᒥᐅᑕᐃᑦ ᐆᒪᔪᖏᓐᓂᒃ ᑕᒪᐃᓐᓄᑦ ᐃᒪᐅᔪᓄᑦ ᑕᐃᒪᐃᒃᑯᓂ, ECCC-ᑯᑦ ᓇᓚᐅᑦᑖᖅᑕᐅᔪᑦ, ᑕᒪᕐᒥᒃ ᐃᒪᐅᔪᓕᒫᑦ ᐅᑎᖅᑎᑕᐅᓂᐊᕐᒪᑕ ᐊᕝᕙᑦᑐᖅᓯᒪᔪᓂᑦ ᓄᓇᐅᑉ ᖄᖓᓂᑦ ᐃᒪᓕᕆᓂᕐᒧᑦ ᑲᓱᖃᑎᒌᒃᓯᒪᔾᔪᑦ ᒪᑐᔭᐅᔪᖅ ᐊᒻᒪᓗ ᐃᖃᓗᐃᑦ ᐊᒥᓲᑉᐹᓕᕐᒪᑕ ᐃᒪᐅᔪᓂ ᑕᒪᐃᓐᓂ.

ᐃᖃᓗᒐᓱᒡᓗᓂ ᓂᕆᔭᒃᓴᓄᑦ ᖃᓄᐃᙱᑦᑎᐊᖅᑐᓄᒡᓗ ᐃᖃᓗᓐᓄᑦ ᐱᒻᒪᕆᐅᒻᒪᑦ ᐃᓄᐃᑦ ᐃᓕᖅᑯᓯᖏᓐᓄᑦ ᐃᓅᓯᖏᓐᓄᒡᓗ. ᒪᑐᔭᐅᑲᐃᓐᓇᕐᓂᖅ, ᐃᒥᖅ ᐊᑦᑕᓇᙱᑦᑑᔭᕆᐊᖃᖅᐳᖅ ᐃᖃᓗᓐᓄᑦ ᐃᓄᓐᓄᒡᓗ.